

## **DfT Consultation on Motoring Services Strategy**

The Confederation of Passenger Transport UK is the Trade Association for the bus, coach and light rail industries. CPT has over 1500 members comprising all the major bus and coach companies within the UK. Their views are gathered through our National and Regional Committees together with individual company responses.

### **1 Which Agencies do you deal with and how often?**

CPT deals with DSA, DVLA and VOSA on a regular basis through attendance at formal committee meetings of each others organisations, formal liaison meetings to discuss strategic operational issues and informal contacts with members of each organisation to resolve daily operational issues reported to CPT by its bus and coach operators.

In general the working relationship at all levels with representatives of VOSA and DVLA is extremely good. The DSA are not so responsive and at times it is a struggle to obtain answers from them regarding daily operational problems or for them to engage effectively with the bus and coach industry to discuss future strategic issues and where current policy is detrimental and an administrative burden to the efficient daily operation of bus and coach services in the UK.

CPT believes that whilst VOSA and DVLA can demonstrate effectively that they are already moving to the DfT mission statement the same cannot be said for DSA.

### **2 Which Service have you used in the last 12 months.**

As already stated in Q1 above, CPT has dealt with DVLA on Vehicle Registration Documents, Driver Licences, 3<sup>rd</sup> EU Licensing Directive, Medical Renewal of licences.

CPT has dealt with VOSA on improving compliance through, Next Generation PCV Testing, Next Generation PCV Enforcement, How to improve current PCV test results and roadside enforcement, daily operational issues from members and liaison with VOSA

Leeds on all aspects of Operator Licensing and Service Registrations.

CPT has dealt with DSA on Driver CPC and PCV Driver testing.

### **3 DfT Guiding Principles**

**Putting consumers and businesses at the heart of what we do.**

The ongoing implementation of testing transformation has seen VOSA transforming its services making annual testing more accessible to bus and coach operators and reducing the overall testing costs through the offering of more and more convenient testing locations. Their willingness to engage and listen with the industry to consult and discuss how the industry will operate in the future and how they can assist in this to the benefit of Quality Bus and Coach operators is a demonstration of how well this agency has transformed from the old image of only looking to issue prohibitions and being remote from engaging with the industry.

DVLA through its use of its services with Post office counters will enable more Operators to find an easier and cheaper way of engaging with DVLA services than was previously the case through a small number of DVLA offices. The ability to deal efficiently with processing new driving licence applications and renewals will always be challenging.

DSA has not done this as effectively as the other organisations, booking tests and the removal of delegated examiner status from PCV companies due to not meeting the minimum number of driving tests primarily because of the current economic climate is an excellent example of DSA being out of touch with its consumers and their business requirements. When the economy improves the ability of the PCV industry to recruit, train and test new bus and coach drivers will be severely delayed as a result of this draconian action by DSA. The continual drive to gold plate the EU Driver CPC directive in spite of industry and training provider objections only seeks to add administrative and cost burdens on industry.

**Rationalising the number of bodies and agencies involved.**

CPT considers that consideration should be given to rationalising the number of bodies and agencies involved in the delivering of these services. There should be one body delivering Licensing and Testing of Drivers and another dealing with Vehicle Certification, testing and roadside enforcement. This could be achieved through the merger of DVLA and Certification Agency.

### **Working more closely and collaboratively**

CPT would expect that the current collaborative working with DVLA and VOSA would continue regardless of the outcome of this consultation.

It would strongly recommend that consideration is given by DfT to how the bus and coach industry can deliver PCV driving tests directly by bus and coach operators through a revised delegated examiner testing regime rather than having to be reliant on DSA examiners and test stations. This could be achieved easily through a reduction in the minimum number of tests required to obtain a Delegated Examiner status and the requirement they can only test their own employees. The ability to carry out tests for other bus and coach companies would reduce the administrative and cost burden on the industry and encourage new drivers into the industry as it would be easier for the unemployed to be trained and tested rather than having to fund the PCV licence acquisition themselves which at over £3k can be prohibitive to many on unemployment benefit. This would meet the Governments Policy objectives of helping the unemployed into work and the DWP/JCP/CPT Sector Based Work Academies is an excellent example of this.

### **4 Will the vision for digital service assist?**

The proposed vision to improve digital services will inevitably assist businesses to reduce administrative time and improve business efficiency provided the services deliver what customers require and not just what the relevant agency wants to alter.

Liaison with industry stakeholders throughout the process is vital to enable this vision to be realised.

### **5 Delivery of Services On-line**

The availability of on-line services will in general assist bus and coach businesses.

## **6 Proposals to reform VCA**

CPT and bus and coach operators have limited dealings with the VCA and the information contained within the consultation document is extremely limited as to what the options for new models are currently under consideration. CPT would be interested to know if any of these proposed models would have any detrimental impact on the timescales for certifying new and modified vehicles.

## **7 Future Structure of VCA**

As stated in Q6 CPT has very little dealings with VCA therefore we cannot comment on the future structure of the organisation until such time as the proposed new business models are published.

## **8 Do you support our plan to bring driving test closer to the customer?**

The overhaul of driving tests and driving test centres is long overdue and there is a real opportunity to use the lesson learned in commercialising commercial vehicle testing through ATF's rather than VOSA and use these to reform and improve the PCV driving test.

The experience of the Bus and Coach industry in delivering PCV driver testing through the use of Delegated Examiner is one which through a minor amendment to the Road Traffic Regulations and the implementing regulations for Driver CPC could easily enable the bus and coach industry to train and test its own PCV drivers. The increase in Delegated Examiners required could easily be found from within the current sector and they would still have to meet the same accreditation standards for the delivery of tests laid out by DSA for the current PCV Delegated Examiners.

The introduction of this bus and coach industry proposal would be simple to achieve and CPT suggests that DfT investigate this option with CPT to help businesses in this sector as a matter of urgency following the closure of this consultation.

## **9 How would our plans to bring driving test closer to the customer affect you as a customer or business?**

By introducing the CPT proposal in 8 above this would have time and cost benefits through delivering PCV tests at times and at more convenient locations meeting industry requirements rather than using DSA test centres. This would ultimately benefit the passengers using buses and coaches through a greater supply of quality drivers in a shorter timescale than is currently the case.

In certain circumstances bus and coach operators premises could be used to deliver other driver testing on a similar basis to commercial vehicle ATF's. This would offer businesses the chance to offer additional services at more convenient locations for the public whilst at the same time enabling DfT to reduce its overall driver testing estate.

## **10 Do you support our plans to reform Bus and Coach testing?**

CPT supports the current process developed between VOSA and the bus and coach industry offering commercial opportunity to businesses in becoming ATF's. It will also work with VOSA to develop beneficial industry solutions in locations where an ATF solution is unlikely to be achievable.

The industry values the independent audit that the current testing arrangement enables and would need to be convinced that any alternative testing arrangement, would still have all the independent safeguards in place to ensure vehicle safety and roadworthiness.

## **11 How do you think our plans to reform Bus and coach testing will affect road safety?**

The introduction of ATF's has had no negative impacts on the annual test results achieved by the Bus and Coach industry. The current proposal under development for a flexible VOSA tester regime anticipates this too will have no negative impact on road safety.

As outlined in 10 above the option for a bus and coach operator to use its own tester to carry out tests on its own vehicles requires

further investigation as to how safeguards could be in place to ensure there is no compromise on vehicle road worthiness.

**12 How do you think our plans to reform bus and coach testing will affect convenience for customers and businesses?**

The answers given in questions 10 and 11 regarding the policies currently under discussion with VOSA will continue to deliver benefits to bus and coach operators.

**13 How do you think our plans to reform bus and coach testing will affect red tape for customers and businesses?**

The current developments with more flexible VOSA testers will inevitably lead to less red tape for customers as more vehicle tests will be conducted during the day at more convenient locations.

The proposal from CPT for the bus and coach industry to increase the amount of PCV driving tests it conducts itself would massively reduce the red tape and cost burden currently endured by Operators as a consequence of have to carry out testing using DSA test centres and examiners.

**14 Do you have any comments on our plans to reform Bus and Coach testing?**

Apart from all of the comments already outlined in the answers above. One area which would significantly benefit bus and coach operators and would not compromise road safety given the maintenance undertakings given by operators as part of the Operator Licensing regime would be if the requirement for buses and coaches to have an annual test was extended for new vehicles to be tested two years after date of first registration and then annually thereafter.

**15 Do you agree with our outline proposals for defining our organisations to deliver better services?**

CPT certainly supports the principle to rationalise the number of agencies and the combining of DVLA and DSA into one agency would be a step forward. The current practice of having a PCV driving licence being issued by DVLA and the Driver CPC Driver Qualification card by DSA is one glaring example of bureaucracy and unnecessary red tape as neither organisation talks directly to the other to resolve any problems which occur.

All of our other reasons have been stated earlier in this consultation response.

**16 Do you have any comments on our plans to redefine organisational boundaries?**

Please see the previous answers provided by CPT in this consultation.

**17 Do you have any other comments on how we can improve our service to you?**

CPT believes that DfT and its agencies can only continuously improve its service to the bus and coach industry, if it continues to liaise and consult with it on all aspects of current and future operation of the bus and coach industry. By doing so suitable solutions will be found which will benefit bus and coach businesses as well as DfT.

**18 Do you have any other comments on our approach outlined in the strategy?**

CPT has no further comments on this consultation at this time but looks forward to playing an active part in ensuring the implementation of future proposals benefit the bus and coach industry and ultimately the passengers which use our services.