

Response to DfT Consultation

Motoring Services Agencies

7 March 2013

A Background to ALBUM and Appreciation of the Study

1 The Association of Local Bus Company Managers (ALBUM)

ALBUM represents the 'non-aligned' sector of the bus industry. The Association has 150 members, representing over 50 companies in the independent, state-owned and municipal sectors, who between them operate 5,000 buses, which is about one bus in twelve nationally. This makes ALBUM members collectively Britain's fourth largest bus operator - in the same league as the big five multi-national groups. First Group runs 8,000 buses in the UK, Stagecoach 7,000, Arriva 6,200, ALBUM members 5,000, Go Ahead 3,900 and National Express 1,600.

2 DfT Consultation on reforming Motoring Services Agencies

The Department for Transport (DfT) consultation invites views on options for reforming the four DfT sponsored motoring services agencies, with the aim of "putting the consumer and business at the heart of" what the DfT does. The four agencies are each sponsored through the Motoring Services Directorate of DfT, which manages their performance and co-ordinates direction and strategy. The Agencies and our understanding of their role are:

2.1 Driving Standards Agency (DSA)

The DSA's role is to improve road safety in Great Britain by setting standards for driving and motorcycling, and for the education and training of drivers and riders. DSA also carries out theory and practical driving and riding tests

2.2 Driver and Vehicle Licensing Agency (DVLA)

DVLA's main responsibilities are to:

- maintain driver and licensed vehicle records
- collect Vehicle Excise Duty (VED)

- limit vehicle tax evasion to no more than 1 per cent
- support the police and intelligence authorities in dealing with vehicle related crime.

2.3 Vehicle and Operator Services Agency (VOSA)

The Vehicle and Operator Services Agency (VOSA) was formed on 1st April 2003 following the merger of the Vehicle Inspectorate and the Traffic Area Network division of the Department for Transport. VOSA provides a range of licensing, testing and enforcement services with the aim of improving the roadworthiness standards of vehicles ensuring the compliance of operators and drivers with road traffic legislation, and supporting the independent Traffic Commissioners

2.4 Vehicle Certification Agency (VCA)

VCA is the United Kingdom's national approval authority for new road vehicles, agricultural tractors and off-road vehicles. It has close links with the UK Government and European policy formulation and enforcement of vehicle safety and environmental standards.

VCA's main headquarters office is in Bristol, with an office and test facilities on the MIRA site at Nuneaton and an office at the Millbrook Proving Ground near Milton Keynes. It also has offices and agents in many other locations around the world, enabling it to satisfy the needs of vehicle manufacturers wherever they are based. It also provides international test and certification services for vehicles and vehicle parts.

3 Areas for Action

The Government's aims of merging agencies, cutting overheads and privatising services could have significant effects for bus operators. The consultation document sets out six areas for action:

3.1 Being at the forefront of digital services and supporting those who find access to digital services difficult

3.2 Supporting economic growth and vehicle manufacturing by reforming the way the Vehicle Certification Agency works

3.3 Bringing the driving test closer to customers, including looking at the locations from which tests are delivered

3.4 Transforming HGV, bus and coach testing by expanding joint ventures and collaboration with private sector providers, and reducing the number of government owned test stations

3.5 Delivering better customer services by listening to what our customers tell us

3.6 Defining organisational boundaries to deliver better services, and by rationalising the number of agencies and to reduce cost and improve consistency.

4 Scope of Investigation

The DfT is particularly looking for comments on the following:

- 4.1 The services and products suitable to be delivered increasingly by digital channels, for example car tax and tax discs, and driver licensing
- 4.2 Options for reforming the Vehicle Certification Agency (VCA)
- 4.3 Options for the delivery of the practical driving test and HGV, lorry and bus test, including authorising others to carry out testing on its behalf in certain circumstances
- 4.4 Its organisation and what services it could bring together and how.

5 ALBUM Response to the Consultation

ALBUM's submission to this consultation, which comprises 18 consultation questions, is based on the views obtained in a survey of its members.

All the questions are relevant to ALBUM members and five (Questions 10-14 on bus and coach testing) are specific to the bus and HGV industries. It is vital to our industry sector that the DfT's proposal to re-organise the four agencies is carried out correctly.

B Answers to the Consultation Questions

1 Which Agencies do you deal with and how often?

ALBUM members deal with the DVLA, VOSA, DSA regularly, but have less contact with the VCA. Examples of the frequency and nature of contacts includes:

DSA

Almost daily, in respect of Driver CPC records and booking theory and practical driving tests

DVLA

Contact ranges between several times a year for the checking of drivers' licences and infrequent contact with medical branch. We recommend a review of the working of the medical branch, with the aim of speeding up decision making between medical experts and customers.

When renewing licences and where a medical report is required, this has to be sent to Swansea and there is a considerable delay in processing the license.

VOSA

Frequent, sometimes almost daily contact with the local VOSA offices in respect of Authorised Testing Facility or to book vehicle tests. Infrequent contact with the VOSA Head Office in Bristol; semi-regular contact with Central Licensing Office in Leeds to submit local bus service registrations and variations.

2 Which services have you used in the last 12 months?

As for Q.1 above. SORN vehicles are dealt with on-line whenever possible, although not all vehicles can be done this way. Forms are downloaded from the Agencies' websites.

3 Referring to page 15 of the strategy, "Our Guiding Principles" please tell us which of the principles, if any, would help you in our dealings with us?

ALBUM members support the principles, provided they are delivered effectively. Implementing the proposed changes would not would not affect the way ALBUM members deal with these agencies, although there would be detrimental effects for an operator that uses VOSA local office which may be about to close. We would welcome assurance that these good words will work in practice

There is concern with regard to VOSA and the new ATFs (Approved Testing Facility) that, once all the Test Stations are closed, there will need to be a reduction in test fees to compensate for the cost of attending an ATF. At the present time companies do not have to pay a separate fee to have vehicles tested at the local test station it is part of the test fee. They will, however, under current proposals have to pay a lane fee for using an ATF station.

4 Will the vision for digital services outlined on page 17 of the strategy help you in your contacts with any of the four Agencies?

Yes. ALBUM members already make use of digital services with DSA, DVLA and VOSA, although some expect the impact of developments in digital provision to be slight. Some members would welcome the more localised provision of PCV driving tests, which is seen as an opportunity to work with DSA to use company premises, much as VOSA does. Members who are already an ATF and are keen to see this expand.

We support opportunities to improve the convenience of bringing driving tests closer to customers and transforming HGV/PSV testing. Several opportunities arise here.

i) The required number of delegated examiner tests must be reduced. The present criterion of 75 tests, has proved very difficult to achieve in recent years, given the even lower than usual staff turnover due to the recession. In addition, could private companies with delegated examiners be granted approval to test delegates other than just their own employees? Some operators have gained Department of Work and Pensions (DWP) contracts to train drivers, so this would be practical and allow them to deliver the full training package including testing. This would also assist companies to reach the required number of tests.

ii) We suggest that if local a testing facility, the logical option is for the DSA examiner to test at the company's own site, or to gain its own examiner status back. One member discussed this option with DSA sometime ago, but the barrier was that the DSA was looking for a full day of testing, understood to be four in a day. For this option to be beneficial to the firm it would need to be able to bring an examiner on to its site for any number of tests up to the maximum for a day; this does happen for some larger undertakings. The logic for this is that the firm can plan, for example, four new starters, plan testing in one day but be left short of the required tests on a re-test day if one delegate fails and three pass. The company would need either to re-test the one trainee or face delay until it built up a further group of drivers. Neither would be cost effective or practical for the firm's business needs. The possibility of re-testing taking place at an alternative location could mitigate the disadvantages.

iii) A very useful option would be a shared examiner between operators in the same locality, but currently the rules only permit designated examiners to test employees of their own company. We suggest that this be relaxed to enable shared examiners between operators in the same area. There would be a cost benefit; the numbers of trainees and therefore standards would also be kept up. This change would enable the minimum test figures per examiner to be reached more easily, e.g. the four North West municipals could probably justify one between them.

There is nothing in the vision about the biggest problem, the long waiting times for tests, that must be reduced in order to benefit the customers.

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?

Yes, particularly if it avoids the delays encountered with phone or postal contact, and it means services can be delivered outside normal office hours. On-line access is better as long as it is robust and actually works efficiently, some Government online access is very poor and cumbersome. We would need to see what services become available on line first. A minority of members were sceptical that the change would make much difference.

6 Do you think the proposals to reform VCA as outlined on page 17 of the strategy will help you and/or the UK economy?

Yes if it works. Streamlining the VCA and cutting costs and speeding up paperwork may assist, but we cannot see this having a major impact on the bus industry or the economy

7 Do you have any suggestions for the future structure of VCA or the range of services it offers?

No

8 Do you support our plans to bring the driving test closer to the customer as outlined on page 17 of the strategy?

Yes, but waiting times for tests for PCV drivers must be reduced

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

It would help to keep down the cost of recruiting and training PCV drivers; it could be a business opportunity for bus operators to host PCV tests for third parties. Less time would be spent and expense incurred travelling to and from test centres

DSA

There needs to be attention given to the conflict between the DSA's regulatory and provider roles. This was demonstrated by their decision to reduce the number of delegated examiners, ostensibly for test quality reasons, rather than as a job creation scheme for the Agency's own staff.

Several ALBUM members have criticised the introduction of a mandatory minimum number of tests as a condition for allowing delegated examiners. It is

our view that the number of 75 could be reduced by two thirds to 25 with no loss of quality. The current level results in delays to the completion of training and to an increase in the presence of non-productive staff on the payroll awaiting a delayed test date. We endorse the reasoned statement on this issue submitted by Blackpool Transport in response to this consultation.

We would support more private testing provision. If companies could take on outside tests, this could be a way to get a delegated examiner back.

DVLA

If the local office network is reduced as already planned, the DfT will need to clarify how it will deal with the issues that require an 'in person' visit to local offices, e.g. for ID verification and security purposes.

As stated in our response to Q.1, a review of the working of the medical branch needs to take place, with a view to speeding up decision making and introducing more email communication between medical experts and customers, to replace the current paper chase.

VOSA

There needs to be a review of the effectiveness of the centralised O Licence and Bus Service Registration Unit at Leeds. Only this week the lack of training and experience of the staff was demonstrated by a call to one of our members stating that they needed a list linking O disc numbers to registrations. It took two telephone calls to persuade the individual that that was the goods system and theirs was a passenger licence!

There are also regular cases of registration acceptances being delayed. They are often only received after the event in the case of 'one-off' services.

The trade press shows that VOSA's role in providing administrative support to the traffic commissioners is sometimes restricted by the other demands on its time and budget. We have no doubt the Traffic Commissioners will confirm this unsatisfactory situation.

10 Do you support our plans to reform HGV, bus and coach testing as outlined on page 18 of the strategy?

Yes, although the closure of Government test stations without adequate replacements has caused significant inconvenience and lost flexibility, due to some being open on odd days of the week, or able to test certain types of vehicle only, and for the long term MOT testing programme (i.e .booking 12 months ahead).

11 How do you think our plans to reform HGV, bus and coach testing will affect road safety?

Providing standards are maintained and monitored consistently there should be no adverse impact on road safety. The reform should free up VOSA staff and allow more mobile inspections on the road. It will not affect good operators who hold road safety as an important requisite.

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

As with our ATF, the proposed change may mean that test centres are located more conveniently to major urban areas, thereby minimising travelling time and distance for the test. Local centres will mean less time and money travelling to them. The change will not affect good operators who hold road safety as an important requisite

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

Red tape is still Red tape wherever a vehicle is tested; it must be eliminated. For example if a vehicle is re-registered, the papers have to be sent to DVLA and on return they have to be forwarded to VOSA; surely this can be streamlined?

14 Do you have any comments on our plans to reform HGV, bus and coach testing?

VOSA has mentioned it may close some test centres and use private ones. This is acceptable unless a private centre is unable to test. Where is the fall back if VOSA has closed its centre?

We are disappointed to note testing stations are being closed before replacements from the private sector are in place.

Currently testing stations which have been designated are only testing their own vehicles, not allowing other operators vehicles to use them e.g. Yeoman's Coaches of Hereford.

VOSA have changed its operational areas for compliance reasons . For example, a company that came under Hereford is now overseen by Kidderminster: why the changes?

15 Do you agree with our outline proposals for defining our organisations to deliver better services as outlined on page 18 of the strategy?

We agree that having common back office services makes sense but wish to see the setting of standards (DSA) kept separate from the regulatory (VOSA) function. We, need to see some detail though.

16 Do you have any comments on our plans to re-define organisational boundaries?

There is no reason why local offices could not be shared between different agencies as long as functions are kept separate

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

There is a long turnaround time for both PSV and HGV O license renewals.

Agencies need to focus more closely on the financial side of applications to ensure that applicants can sustain their operation for the whole period.

The enforcement department of VOSA needs to be more pro-active. It was unable to follow up a complaint with regard to illegal operation: fruit pickers being carried without a road service license. This is detrimental to the complainant's registered service, and therefore needs immediately attention to prevent illegal carriage from continuing.

Allow all agencies must be allowed to share information and have a site where it can all be viewed.

There is a lot of waste, for example:

- drivers now have a paper driving licence, a driving card, a tachograph card and a CPC driving card, all of which have to be carried with them. Why not just one card not three? The cost to the government must be enormous and has to be passed on to the customer.
- If you take a vehicle with an RPC (reduced pollution certificate) for test, you lose at least a month of your test compared to a conventional vehicle. When you take a bus for its Annual and RPC test, you cannot have the RPC and the Test certificate dated the same. The RPC test certificate can only be dated to the end of the month but the annual test certificate can be dated for the following month. The RPC can only be dated to the end of that month on which it is presented and annual test can be dated to its expiry date as long as it is not over two months. This means that the RPC runs out before the annual test. Thus you can only bring a RPC and Annual test in to be done together as long as they both expire within the month you present the bus and you cannot have them done two months early

which you are allowed to do for an annual test. This is grossly unreasonable and needs sorting.

- We have to take the old MOT certificate to the Test station to show a vehicle is seat-belt tested and to get the full period of the test: surely VOSA can have this on line to save this trouble?

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

A lot more joined up thinking is needed between the departments and better efficiency.