

THE ORGANISATION

The Motor Schools Association of Great Britain (MSA) makes the following response to the Department of Transport Consultation on Motoring Services Strategy.

WHO WE REPRESENT

The MSA is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (ADI). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors and represent their interests together with those of potential driving instructors and a number of bus/coach instructors and motorcycle instructors. The MSA is the voice for around 6,400 driver/rider trainers. Throughout this response we use the term “we” to refer to the organisation MSA and our members on a small number of occasions where indicated our response may be for members or the organisation.

HOW WE GATHERED VIEWS

In order to gather the views of MSA member’s details of the consultation were circulated, via the relevant chairs, to all of the ten MSA committees of the regions and nations of Great Britain. Details of the consultation were published in our news magazine *Newslink* and on the associations’ web site at www.msagb.com. In addition the information was transmitted to followers of the MSA on social media sites. In *Newslink* we published an indication of our intended response and invited members to comment.

PUBLICATION OF MSA COMMENTS

We are content for our response to this consultation to be published.

SUMMARY OF OUR VIEW

STANDARDS The regulator to maintain full control of the regulation of all driver testing and training, including the training of examiners and responsibility for standards of test and quality control.

PRICES Test fees should remain frozen for the foreseeable future and if tests are to be conducted in the private sector, fees should then be reduced to prove the good value of privatisation.

WAITING TIMES The control of waiting times at all types of centres is vital, we believe that waiting times for tests should be set by the regulator and driver trainer representatives working together and when agreed remain fixed for a period of at least 3 years.

CONSULTATION Questions

Q1. Which Agencies do you deal with and how often?

MSA Response. MSA members deal with the Driving Standards Agency (DSA) and, from time to time have dealings with the Driver and Vehicle Licensing Agency (DVLA). The MSA has regular contact with the DSA and occasionally have dealings with the DVLA. Most members will not have any dealings with The Vehicle and Operator Services Agency (VOSA) or the Vehicle Certification Agency (VCA) and neither to the MSA.

Q2 Which services have you used in the last 12 months?

MSA Response. Most if not all members will have had some dealings with the DSA regarding driving tests and their Registration as Approved Driving Instructors. Some will have had dealings with the DVLA regarding MOT testing of cars and driver licensing. The MSA have dealings with various officials and departments within DSA on a regular basis.

Q3. 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?

MSA Response. Whilst there is always room for improvement in any organisation, generally speaking the services our members receive from the DSA are of a reasonable standard and we do believe that most of the time they try to **put the consumer at the heart of what they do.**

We have concerns that **rationalising the number of agencies and bodies** may reduce the level of service we receive whilst none of the savings made will be passed back to the customers.

We already have experience of **working with a broader range of partners** through the contracting out of the driver theory test. Our experience with these contractors has been excellent; our members notice that theory tests are never disrupted by strike action.

Q4. Will the vision for digital services outlined on page 17 of the strategy help you in your contacts with any of the four agencies?

MSA Response. Yes we believe the work done by both DSA and DVLA has been excellent in this regard. The recent launch by DSA of the Online Business Service (OBS) and Internet Booking Service (IBS) has been well received by members who rate them highly.

We have two principal concerns about the digital by default agenda:

- a) We are concerned about the disenfranchising of those who don't wish to be involved in digital services. In the governments Mid-Term Review *Together in the national interest* it states “*We will make sure that no one is left behind by ensuring there is Assisted Digital provision for those who are unable to use digital services by themselves.*” This suggests that only those who are unable to use digital services will be helped not those who are unwilling to use them. This would appear to be an extremely draconian measure that flies in the face of the government's commitment to reduce the financial burdens on small businesses. We would urge that arrangements should be kept available where contact with the test providers and regulators can continue to be made by post and telephone for the foreseeable future.
- b) The DSA seems to cherry pick the projects they decide to improve. The new OBS and IBS systems above replace previous on line services that were not as good but did work. In the meantime, the driver trainer profession has to struggle on with a

booking system for Approved Driving Instructor (ADI) qualifying examinations and for tests of continued ability and fitness to give instruction (check tests) that is not just antiquated but is arguably not fit for purpose. We have been talking about a new online scheme for over five years with no date yet proposed for the introduction of such a system.

Q5. 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?

MSA Response. They will help those who are online. However, they will make it increasingly burdensome for those who are not.

Q6. Do you think the proposals to reform VCA as outlined on page 17 of the strategy will help you and/or the UK economy?

MSA Response. Very few of our members deal with this agency.

Q7. Do you have any suggestions for the future structure of VCA or the range of services it offers?

MSA Response. Very few of our members deal with this agency.

Q8. Do you support our plans to bring the driving test closer to the customer as outlined on page 17 of the strategy?

MSA Response.

TESTING FROM OTHER LOCATIONS We do support the concept of bringing the driving test closer to the customer and have campaigned for this for a number of years under the banner "Local centres for local people".

The principal of testing from other locations is not new. Large parts of NW Scotland and the Islands have operated in this way for many years. We believe that the key point is that the location has to provide suitable facilities for the candidate and access to sufficient suitable routes for the number of examiners operating from that centre.

We are however concerned that taking tests to the customer could lead to a watering down of standards and affect the integrity of the test. If tests are to be conducted almost anywhere to suit demand will suitable test routes be available or will examiners be left to make up their own routes? Suitable routes should include access to a range of hazards to make a meaningful test possible and to ensure compliance with the 2nd EU Driving Licence Directive.

In addition the tests need to be scheduled in such a way that adequate and meaningful quality assurance is carried out. This does not just include direct supervision but must enable management information to be collated on each examiner that operates from that location so that a comparison of performance is possible (fault analysis, pass rates, complaints etc). The more locations used, the fewer tests conducted from each and the

more examiners that operate from that location, then the less likely it is that any meaningful comparison can be carried out.

It is also a concern that local testing could affect the integrity of the test. The routes could be less demanding which would lead to candidate's having an easier test. If the routes were left to the examiners, candidates could be tested on a too difficult or too easy route. We understand that full time driving test centres (DTCs) have an overall pass rate of 48% while occasional DTCs, typically those in remote areas have a 68% overall pass rate. This may be explainable but needs to be kept under review.

Working away from main test centres increases the likelihood of procedures being ignored or tests being fraudulently conducted. This is something that government needs to be mindful of in light of the recent arrest of a driving test examiner in London. We do not believe these problems are insurmountable but we do believe that government needs to be mindful of these matters when progressing the concept of bringing the driving test closer to the customer.

TEST DELIVERY OPTIONS We do not believe that test delivery by a non government agency would necessarily be a bad thing. It happens successfully now with the theory test and is common across the European Union. Driving test booking could be privatised quite easily without directly affecting the public.

However, we do have grave concerns about the effect that privatisation might have on standards or at best the public perception of standards. We are concerned that public perception may be that the service provider is adjusting the standards to meet key performance indicators or to maximise profit. Robust procedures would need to be established to address this concern and we believe all complaints relating to content and conduct of tests should be dealt with by the regulator not a contractor.

Ideally the task of standards regulation would stay within the remit of a relevant government body and they must set and monitor the standards and use robust contract management procedures to ensure that excellent customer service is delivered and standards are maintained. It is also important that steps are taken to maintain the standards of the regulator.

Regarding the question of service standards in a contracted out service, we would hope they would concentrate more on the customers than the staff. We currently have a situation where DSA staff can decide their own working hours meaning that for some, the working day concludes by mid afternoon, leaving the customers without the option of late afternoon test appointments. Hopefully a private company would be looking to offer a better service to its customers, including weekend service when called for, providing traffic conditions are suitable. It will be important in the future to ensure that examiner contracts include weekend working.

We also have concerns about the prices that may be charged for driving tests in the future. We believe that test fees should remain frozen for the foreseeable future and if tests are to

be conducted in the private sector fees should then be reduced to prove the good value of privatisation.

ESTATE REVIEW It would appear that with a very mixed estate it will always be impossible to make every test centre come up to the same standard so we suggest that a radical view of the way in which tests are marketed to the public.

The testing authority will want to have as few centres as possible each with a high throughput of candidates. However, many members of the public and some ADIs favour more localised testing. The facilities available in the corner of retail shop premises are unlikely to provide the same facilities that could be available at a modern multipurpose test centre (MPTC). This means that waiting times at occasional centres because of a lack of facilities, routes or planning permission may rise to unacceptable levels.

We would suggest that a review of the DTC estate should consider the creation of core centres sensibly cited to ensure reasonable coverage with pop-up/occasional type centres wherever necessary to meet demand.

In order to encourage throughput the core centres should be made particularly attractive for the public and driver trainers by making them worth travelling to. Rather than the ostentatious parsimony currently practiced by the DSA, where coffee machines have been removed in order to meet carbon reduction targets that could probably have been better met by transferring a large number of staff journeys to public transport, waiting rooms should be designed to be welcoming for candidates and trainers. Coffee machines, public computers, free WiFi, toilet facilities would all encourage the use of these centres alongside the possibility of discounted tests at core centres perhaps to fill less popular appointment slots like early mornings.

The control of waiting times at all types of centres is vital we believe that waiting times for tests should be set by the regulator and driver trainer representatives working together and when agreed remain fixed for a period of at least 3 years.

Q9. How would our plans to bring the driving test closer to the customer affect you as a customer or a business?

Q10. Do you support our plans to reform HGV, bus and coach testing as outlined on page 18 of the strategy?

Q11. How do you think our plans to reform HGV, bus and coach testing will affect road safety?

Q12. How do you think our plans to reform HGV, bus and coach testing will affect convenience for customers and businesses?

Q13. How do you think our plans to reform HGV, bus and coach testing will affect red tape for customers and businesses?

Q14. Do you have any comments on our plans to reform HGV, bus and coach testing?

MSA Response. We feel that our answers to the other questions in the consultation apply equally to questions 9 to 14 about HGV, bus and coach testing.

Q15. Do you agree with our outline proposals for defining our organisations to deliver better services as outlined on page 18 of the strategy?

MSA Response. We refer to our answer above regarding ESTATE REVIEW and the provision of tests available throughout the day at centres the candidates and instructors want to go to. Delivered within sensible waiting time criteria and at reasonable prices.

Q16. Do you have any comments on our plans to re-define organisational boundaries?

MSA Response. Our concern with re-organisation is that the expertise contained within the DSA is not diluted by these actions. We believe that it will be important to retain a cadre of testing and training experts within the regulatory body.

Q17. Do you have any other comments on how we can improve our service to you?

MSA Response. Yes DSA, DfT should do what it says it is going to do. The service provided by the DSA to driver trainers and driving test candidates is generally of a satisfactory nature. However, the lack of any progress on the introduction of long discussed and often promised proposals to improve road safety is appalling.

There are still no statutory provisions to underpin the standards of HGV, bus and coach driver trainers or fleet trainers or those involved in train the trainer activities, all of which were included in the Road Safety Act 2006 but have never been introduced. Compulsory CPD for ADIs worked on for years by the DSA and driver trainer bodies but now abandoned. The abolition of the trainee licence system and changes to regulations to allow ADIs to take learners on motorways, promised in 2011 by ministers still not introduced.

Q18. Do you have any other comments on our approach as outlined in the strategy?

MSA Response. We view this consultation paper as a refreshing opportunity to perhaps have some input into policies and ideas before they are fully developed. We look forward to more detailed consultations on these subjects in the future.