

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

We are responding as the Department for Transport Departmental Trade Union Side (DTUS)

As the recognised trade unions we have intimate, daily contact with all the agencies

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

As the recognised trade unions, our members actually supply all the services that the agencies provide.

**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?**

Three principles are set out in the document on page 15. They are:

- 1. Putting the consumer and business at the heart of what we do;*
- 2. Rationalising the number of agencies and bodies;*
- 3. Working with a broader range of partners*

We will take each of these in turn and comment on them (sharply at times) but also suggest changes to the draft strategy.

- *Putting the consumer and business at the heart of what we do*

Presumably the agencies operate to this principle already and therefore this is stating the seemingly obvious (the agencies wouldn't say that they don't put customers and business at the heart of what they do). Thus the principle in itself adds no value in how the agencies work.

Therefore for us the interesting thing is not the first principle but the commentary on page 15 that accompanies it.

DfT writes 'We want to offer a cost effective and high quality service. This means using the most cost effective channels available and pushing a 'digital by default' approach, so our services are delivered better on the web or via your phone'.

When you read the government's 'digital by default' strategy it does not have the formulation 'pushing a 'digital by default' approach, so our services are delivered better on the web or via your phone' or anything resembling it.

Where the phone is mentioned it is in relation to the Assisted Digital at section 7 of the 'digital by default' strategy:

*What we provide for people who aren't online will depend on the service and the needs of the user. Many people who are offline will keep using the*

*services in non-digital ways, such as face to face, by phone and through intermediaries. In some cases, people may be offered help to use the digital channel.*

*We call this 'assisted digital'. This is an integral part of providing digital by default services. Departments will consider how they will provide this assistance at the same time as they are digitally transforming their services. Government Digital Service will work with departments to develop a cross-government approach to this issue. This is to ensure those users who need this help receive a consistent service across the multiple services they use.*

Now formally the Motoring Service strategy does not mention assisted digital at all (which is a glaring omission) so we cannot be sure whether the mention of the phone is a nod towards assisted digital or in fact DfT actually believes that 'digital by default' encompasses telephony.

**Certainly the DTUS believe that telephony is just as an important element of motoring services as services provided over the internet. Therefore we think there should be a specific part of the strategy that deals with telephony.**

**Moreover the strategy should include a section on assisted digital.**

The commentary against principle 1 ends with '*Where we deliver face to face services, such as testing, we will make the service more convenient and accessible*'.

- *Rationalising the number of agencies and bodies;*

The DTUS believe that any merger at present between VOSA and DSA would be a cost cutting measure and not something which would provide better public service provision.

Moreover it is not clear what service synergies there are between the two organisations.

The fact is that both VOSA and DSA are already being forced towards using private sector premises to deliver their services. We believe this is impacting on the road safety standards. Any proposed merger of the Agencies would have to be based on putting public services first, and maintaining existing staffing levels.

- *Working with a broader range of partners*

This principle is ideological in nature. This is shown by the first part of the commentary against this principle which states:

*We want to build on our existing joint ventures and partnerships and engage with a wider range of partners in the public, private and third sectors to drive improvements to the quality of motoring services.*

Firstly there is no evaluation as to whether these existing joint ventures work, save money etc as compared to in house comparator. They are just a 'given' to be built on.

Secondly, an unbiased, open minded – and we would say intelligent position - would be to allow the possibility that work currently out sourced could be taken in house.

For example the DTUS believe that it would be cheaper and more effective for the theory test to be taken in house. Yet the Motoring Services strategy precludes this possibility.

**Therefore principle 3 should surely be qualified by a statement that if services can be more effectively delivered in house then they should be.**

The document then goes on to say:

*We aim to move away from a position of direct provision to commissioning high quality individual services from a diverse range of providers. Opening up motoring services provision to a wider range of organisations will allow service providers more freedom to innovate, improve the choices available to service users, and deliver better value for money. It will also support economic growth by creating new opportunities for small and medium size businesses. As part of our approach, we will consider other commercial and mutual models.*

Again this statement is ideological in that no evidence is given or cited that shows 'Opening up motoring services provision to a wider range of organisations will allow service providers more freedom to innovate, improve the choices available to service users, and deliver better value for money'. It is just a given. This approach is the opposite of evidence based or evidence driven policy making.

We would argue that the research carried out by the department into delegated examiners in the bus industry and the subsequent accident involvement of their drivers, would point to a clear conflict of interest that undermines safety. This backs up the powerful argument that state employed examiners have no interest in the result of driving tests other than asking the question, does the candidate meet the required standard? The public no longer believes that the profit motive is compatible with public safety

Private sector organisations are always influenced by profit and as been shown countless times will prioritise making money over providing a decent service if the two come into conflict.

Consequently the DTUS believe that only the public service can provide impartial tests which are truly socially inclusive.

Moreover in the case of the practical test and VOSA safety check the service cannot be 'innovated' as the requirement is to assess candidates/vehicles against statutory requirements in a uniform way across the entire country. Given that both VOSA and DSA are heading in the direction of conducting the check/safety test off (government) site the private sector cannot innovate there either. The only areas they can 'innovate' are in reducing staffing and cutting terms and conditions of the staff that remain.

The commentary above must mean that senior managers and Ministers will outsource the practical test and the annual VOSA safety check. The commentary and the principle are incompatible with having an open mind regarding the upcoming reviews of these services.

Moreover, as the drafters of the Motoring Services strategy will be aware the government wants to move to a Service Integration and Management (SIAM) service towers model for IT procurement/operations. The implication of principle 3 is that the SIAM **must** be run by the private sector (presumably an SME) with no knowledge transfer to the Civil Service and for the department not to be an intelligent client. DfT therefore runs the risk of paying well over the odds e.g. as it has with DVLA IT contracts.

**Therefore the strategy should acknowledge that the consequence of principle 3 is that the practical test/safety check will be outsourced. If Ministers really do have an open mind regarding the outsourcing of these two services then the principle and/or the commentary has to be changed accordingly.**

#### **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?**

In the absence of adequate information concerning digital assist, details of the digital services to be provided and the form of these digital services and without a sufficient equality impact assessment then we cannot respond to this 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?**

In the absence of adequate information concerning digital assist, details of the digital services to be provided and the form of these digital services and without a sufficient equality impact assessment then we cannot respond to this question.

**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?**

No. The VCA currently put money into the UK economy and the treasury. All of the options appear to cut out the cash for the treasury and put it to private pockets.

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

Give the VCA the option and flexibility to react to the pressures of a growing business and it will naturally use the talent in the staff to expand and bring in more money for the treasury and the UK economy

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

The DTUS has always argued for accessible high quality public services. This is why some years ago we argued that DSA should have sought compulsory purchase powers when it struggled during a period of high property costs to obtain sufficient sites to establish an accessible network of multi-purpose test centres.

In terms of driver testing, we believe that testing locations should provide good quality accommodation to candidates and staff including provision of toilets. They should be located in areas where there is a sufficient range of road hazards to properly examine candidates' driving competence. The unions believe that the current partnership with Halfords plc is ill advised. The company has a poor reputation and it is surprising that a public service would so readily associate itself with such a partner. The standard of accommodation provided by Halfords is poor because it was never intended to be used as a test centre. For example, candidates have to seek toilet provision in other retail outlets rather than having them provided "in house".

In terms of routes and the integrity of the test itself, the unions are concerned that the use of premises on retail parks will be problematic. This is because candidates will spend increasing amounts of test time sitting in traffic congestion while entering or leaving. This is one of the reasons why DSA began some years ago to abandon centres within congested town centres. Much of the evidence arising from novice driver casualties indicates that they occur on derestricted single carriageway roads late at night or in the early hours. Very few people are killed in traffic accidents in retail parks. The point we make here is that if increasing proportions of the driving test are spent in stationary or slow traffic, we are undermining the current test and missing an opportunity to address the real threat to novice driver safety.

Rather than restrict access to alternative testing properties, as has been done with the Halfords “partnership”, the unions think that a joined-up approach involving local authorities would provide better options in areas that do not have a service and where it is viable – from a road safety view point – to provide one. On this latter point it is important to understand that driving tests can be provided in every hamlet in the country. However that will mean increasing costs and less efficiency as examiners spend more time travelling. It will also mean that the road safety value of the driving test will be undermined.

Therefore there needs to be a balance struck between access, cost and effectiveness in terms of road safety. The unions note that this year saw the first rise in road casualties, reversing a steady downward trend in KSI (killed, seriously injured) numbers. Clearly if we continue to undermine the driving test as we argue is happening, then more people will be killed on our roads next year.

The DTUS believe that the in-house service provides the test in an unbiased manner which is truly socially inclusive. This is because as a public service we are granted the monopoly on the business we provide based on the remit that it is provided to all customers regardless of their diverse background and taking in to account any equality needs.

In moving to any private sector influenced situation, profits will come into play which may mean tough choices may be made leading to a less socially inclusive service. This in turn could lead to public confidence in this service being damaged and the integrity of the fair delivery of the tests being called into question.

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

As argued above, DfT's current policy adversely affects customers.

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

No. The introduction of the private sector to undertake testing of heavy vehicles (both HGV bus and coaches), or as the consultation's Q&A document puts it;

*"....to move away from a government still directly providing most of our motoring services to one it [sic] which it commissions high quality individual services from a diverse range of providers"*

will remove the impartiality, integrity and quality of the test and move it towards a system where there will be a greater likelihood of corruption as evident in the light vehicle testing scheme, the MOT. This is especially the case when considering the loss of income to an operator having a heavy vehicle off the road.

Mixing the private sector ethos of maximising profit with safety is always a dangerous enterprise as recent experience on the railways graphically demonstrates.

In relation to where the tests are undertaken, the removal of the choice to have a heavy vehicle tested at a local, totally independent, VOSA owned station, where no favour is given to any operator, should they operate one or one thousand vehicles, is not a progressive way forward. A far more sensible approach would be to review the location of the VOSA owned sites and where they are not best located for a 21<sup>st</sup> century road network, relocate them, rationalising where necessary, and supplement these test stations with non VOSA owned stations such as designated Premises (DPs) and Authorised Testing Facilities (ATF). This will allow true choice to the operators, both between a VOSA and non VOSA owned site and if so desired between non VOSA owned sites. A better located network of VOSA owned sites, as well as providing access for testing, could also be utilised for enforcement work as well as housing other parts of DfT such as the operational arm of the Highways Agency and the Driving Standards Agency.



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

DTUS believe that allowing the testing of heavy vehicles to be undertaken by the private sector will have an adverse impact on the road safety.

There is no evidence, or reason, to suggest that a privatised heavy vehicle testing regime will behave any differently than GB's private sector run light vehicle testing scheme (car, van and motorcycle).

The only facts that are indisputable are that, despite VOSA staff's ever vigilant efforts in advising and monitoring those private companies which undertake light vehicle testing, when VOSA randomly re-examines recently tested light vehicles, somewhere around 15% are found to have received an incorrect test outcome (that is they either passed when they should have failed or failed when they should have passed). Furthermore VOSA has, over recent years, created a network of High Risk Traffic Initiative (HRTI) teams who, working on a shift basis, mainly monitor the vehicle condition, weight and drivers hours regulations of non GB heavy vehicles. The need to create a HRTI network was as a direct result of the lack of enforcement activity of these vehicles country of origin, which pretty much all operate a privatised system of testing of heavy vehicles.

As a result of the way heavy vehicle testing and enforcement is undertaken in GB our roads are among the safest in relation to Killed or Seriously Injured (KSI).

One interesting piece of research undertaken by the Freight Transport Association (FTA):

[http://www.fta.co.uk/services/vehicle\\_inspection\\_service/driver\\_walk\\_around\\_checks.html](http://www.fta.co.uk/services/vehicle_inspection_service/driver_walk_around_checks.html) States that;

*"In 2011, FTA undertook 555 inspections on trucks immediately after they had been serviced and found that 27 per cent of them would have failed an annual test."*

These are the very people that should testing be moved out to the private sector will be undertaking the annual test. Perhaps this is why Mr A Mair, Head of Engineering at the FTA stated that;

"The standard of third party maintenance provision is often a cause for concern for FTA members, and can have a real impact on annual test failure rates, Operator Compliance Risk Scores (OCRS) and operator licence compliance."

[http://www.fta.co.uk/media\\_and\\_campaigns/press\\_releases/2012/20121105\\_fta\\_pleased\\_to\\_partner\\_irta.html](http://www.fta.co.uk/media_and_campaigns/press_releases/2012/20121105_fta_pleased_to_partner_irta.html)

Additionally an ATF Operators Association has just been formed. A quick look

at their website (<http://atfa.co.uk/>) quickly highlights that their only interest is in profit as there is no reference to road safety but plenty of references to them wanting to test heavy vehicles so that they can “run their own investment”.

This further demonstrates mixing safety with the profit motive will have a detrimental impact on road safety as it is profit and not road safety that is motivating them.

Issues regarding the prohibition of dangerous vehicles presented for test, which could possibly be a loaded HGV at 40+ tonnes, are also present should non VOSA staff undertake testing. VOSA staff have the legal powers to prevent the further use of dangerous vehicles on the road. To allow the private sector to test will remove the ability to prevent the use of such dangerous vehicles. Furthermore should the department decide, in its attempt to allow privatisation, to extend the powers of prohibition to non public sector workers, further opportunities for action based on commercial benefit will become available.

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

Removing the availability to access VOSA's independent, impartial, testing stations from operators, and the general public who run heavy vehicles for their leisure pursuits (such as horsebox owners, rally car enthusiasts, etc), will simply provide barriers to compliance in fulfilling a statutory activity. There are anecdotal reports within VOSA that a horsebox owner had to travel from Kent to Wiltshire to get a test stating that “ they don't test horseboxes in the South East” and an ATF in the South West who “managed” these types of vehicles away from their ATF (presumably not offering a test appointment within a reasonable timescale)

The FTAs submission to the Transport Select Committee's current enquiry into the work of VOSA

(<http://www.publications.parliament.uk/pa/cm201213/cmselect/cmtran/writev/vosa/m11.htm>) states at para 9 ;

*“The Association has concerns about the true availability of testing under the transformation programme. Test bookings are made directly with individual Authorised Testing Facilities (ATF); there is no central booking system. The industry has a Service Level Agreement with the Agency which, for test availability at VOSA sites, states:*

*VOSA is committed to providing test appointments as close as possible to the requested date, and has a target to offer 85% of tests, booked at least 10*

*days in advance, an appointment at the Test station of choice within 1 working day of the requested date. [1]*

In reality, **VOSA's performance against this indicator was usually in excess of 90%. Now that over 50% of annual tests are booked without VOSA's involvement the Agency has no sight of booking fulfilment success levels;** the Agency does recognise that the existing Service Level Agreement is no longer relevant and needs to be reviewed. It states, however, that its market research indicates that there are no difficulties with access to test bookings but FTA is receiving anecdotal reports of "2-3 month" lead times and "30 mile journeys" to find a test slot. The Association is appealing to its members to provide specific evidence where difficulties are experienced, but the concern remains that if there is a problem now or in the future VOSA might not be able to detect it.

Furthermore para 11 of the FTAs submission states;

*"FTA does have concern, however, that this commitment is being tested. At the first ATF operators' conference held in February 2012 delegates urged VOSA's Chief Executive to accelerate the VOSA test station closure process in order to give a better certainty of market for new providers opening up; the Agency has clearly listened to their requests. FTA remains concerned that if the Programme is artificially accelerated resulting in an undersupply of test availability in a region, for the reasons outlined above VOSA may not know about it until it is too late."*

These words of warning from a representative organisation, whose members are not in the direct market for making profit from running a DP / ATF, let alone pressing to increase their profits by undertaking vehicle tests, further highlights the real and present danger of abuse of the system which is being proposed.

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

In reality the red tape involved in operators presenting their heavy vehicles to VOSA once a year to ensure that they meet the minimum safety standards, which is the standard the vehicles should maintain every day of the year, is not onerous. Industry broadly understands and agrees with the need to ensure a once per year compliance check.

Anecdotal reports are emerging that some DP/ATFs, in an attempt to increase their profits are charging for "additional" services which should be incorporated in the "pit fee" they charge for the use of their facilities, such as loading vehicles to allow an effective brake test to be conducted.

Finally and as mentioned in 12 above, VOSA is now not interested in Forward Booking Times(FBT), in fact VOSA is actively moving tests away from Crown owned testing stations are allowing FBTs to increase at its own sites while having no knowledge of the level of service being provided by DP/ATFs. This re-enforces the FTA concern above.

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

To summarise, Civil Servants undertaking annual testing of heavy vehicles do so under the provisions of the Civil Service Code, namely with

- ♦ Integrity – putting the obligations of public service above personal interests
- ♦ Honesty – being truthful and open
- ♦ Objectivity – basing advice and decisions on rigorous analysis of the evidence
- ♦ Impartiality – acting solely according to the merits of the case and serving governments of different political parties equally well

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, allowing profit to become the driver over road safety, then I believe integrity, honesty, objectivity and impartiality of the testing of the largest and heaviest vehicles used on GB roads will be totally compromised.

Looking at the model, and reputation, of the GB light vehicle testing scheme (and in despite of the effort made by VOSA to improve standards), profit and safety does not mix. It would be criminal to move the heavy vehicle testing scheme down that same road.

The examples of EU member states (and beyond) whose vehicles operate in GB necessitated the formation of the HRTI teams is a lesson on what happens when privatised heavy vehicle testing (and little attention to further enforcement activities) is allowed.

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.

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

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

The unions believe that any merger at present between VOSA and DSA would be a cost cutting measure and not something which would provide better public service provision.

Moreover it is not clear what service synergies there are between the two organisations.

The fact is that both VOSA and DSA are already being forced towards using private sector premises to deliver their services. We believe this is impacting on the road safety standards. Any proposed merger of the Agencies would have to be based on putting public services first, and maintaining existing staffing levels.

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

Only the public service (Agency) can provide the high level of service that our main stake holders (the Public) expect. The public expect this service to be delivered by a diverse mix of staff that provides this service in a truly non profit making integral manner and a service that is truly socially inclusive to all within our society. Anything less than this will undermine the provision of the driving test as profit could be put before the truly inclusive delivery of the service to all.

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

The problem with the strategy is that it is not backed by evidence. A series of assertions are made and outcomes are just given.