



Department
for Transport

Consultation on DVSA Fleet Compliance Measure

December 2014

The Department for Transport has actively considered the needs of blind and partially sighted people in accessing this document. The text will be made available in full on the Department's website. The text may be freely downloaded and translated by individuals or organisations for conversion into other accessible formats. If you have other needs in this regard please contact the Department.

Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
Telephone 0300 330 3000
Website www.gov.uk/dft
General email enquiries FAX9643@dft.gsi.gov.uk

© Crown copyright 2012

Copyright in the typographical arrangement rests with the Crown.

You may re-use this information (not including logos or third-party material) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

Executive summary

The Driver and Vehicle Standards Agency (DVSA) is responsible for improving road safety in Great Britain by setting standards for driving and motorcycling, and making sure drivers, vehicle operators and MOT garages understand and follow roadworthiness standards. They also provide a range of licensing, testing, education and enforcement services.

In its 2014-15 Business Plan, the DVSA committed to developing a fleet compliance outcome measure that would allow it to understand better the impact of its activities. The purpose of this consultation document is to set out potential measures that could become part of DVSA's key performance indicators (KPIs) in 2015-16.

We are interested in your views on:

- Whether the three potential outcome measures set out in this consultation document are useful ways of monitoring DVSA's and industry's performance?
- Which of the three would work best as an outcome measure in DVSA's business plan and why?
- Whether there are any other potential outcome measures which you think should be considered and why?

Introduction

The DVSA committed in this year's business plan to consult on an outcome based measure for compliance of the fleet by December 2014.

This outcome based measure will build on DVSA's existing enforcement measure which looks at the effectiveness of its targeting of non-compliant operators and drivers by achieving an overall prohibition rate at targeted checks that is at least 12 percentage points higher than the rate found through random compliance checks.

It will also support DVSA's next generation enforcement programme. This aims to improve heavy goods and passenger service vehicle operator and driver compliance, though making the costs of non-compliance for the worst operators prohibitive. The aim is to improve targeting and recognise operator culture. This will enable an increase in the number of interventions at the right level to be done in a way that reduces burdens on generally compliant operators.

What Does An Outcome Measure Do?

Outcome measures are important as they show how DVSA is performing against its key objectives. They measure the difference DVSA makes and set the context within which specific targets are set, activities are planned and resources are allocated. They will provide DVSA with better data on the effectiveness of its activities and contribute to future operational policy and practice.

Why Do We Need Outcome Measures?

Currently, DVSA does not have an outcome measure for overall fleet compliance. The measure included in the 2014-15 business plan gives an indication of how well DVSA targets its enforcement effort. It does not help DVSA to understand the effectiveness of its enforcement effort and the contribution it makes to raising levels of compliance that will improve road safety. This lack of an outcome measure makes it more difficult for DVSA to understand how best to conduct its business in the most efficient and effective way possible.

How Will We Use An Outcome Measure?

No outcome measure is perfect. It is important to recognise the limitations of different outcome measures alongside their strengths when designing them and interpreting what they say. Many factors influence the levels of fleet compliance. Driver behaviour, the volume of traffic and technological design

are all important factors, among many, in influencing levels of fleet compliance. That said, levels of fleet compliance are likely to be a very important factor in overall road safety. While it may be challenging for DVSA to link precisely the contribution of its activities to fleet compliance and ultimately road safety it's a challenge that should properly exercise the way DVSA allocates its resources and activities. The measures that we have presented in this consultation document will attempt to take account of some of these challenges as far as possible but there may be one-off or irregular factors that impact on outcomes. For this reason it is our intention to use the successful measure as a context measure within which DVSA can account for its actions and their impact rather than as a hard target. We would expect this measure to support DVSA to improve compliance levels through orientating its activities to those businesses which are non-compliant.

Potential Outcome Measures

We have identified three potential outcome measures that could be developed further. We have focused on those that are simple to use and understand, can be measured at reasonable cost and are repeatable so that we can identify and interpret long term trends. These are:

- Vehicle Roadworthiness Compliance Measure for HGVs and PSVs;
- Driver Compliance Measure for HGVs and PSVs;
- MOT Test Quality

Your views on these draft measures and approach are important considerations before we finalise a compliance measure for DVSA's next business plan.

Each measure is discussed in more detail on the next section.

Potential Outcome Measures For The DVSA Business Plan

Potential Measure 1: Vehicle Roadworthiness Compliance of HGVs and PSVs.

Reason for Proposing Measure

The condition of a vehicle has a direct impact on its ability to operate safely. It is a fundamental principle, therefore, that all fleet vehicles should be in good working condition if accidents are to be avoided or minimised.

In 2013/14, using the Fleet Compliance Check survey (FCCS), it is estimated that 10.2% of all miles travelled by GB HGVs are travelled by a vehicle that would face a prohibition if stopped. This non-compliance rate in the GB PSV fleet is estimated at 7.3%.

Measure

This measure would be broken down into two elements:

- The estimated percentage of all miles travelled by GB HGVs which would, if inspected, receive a prohibition for being a seriously non-compliant vehicle;
- The estimated percentage of GB PSVs which would, if inspected, receive a prohibition for being a seriously non-compliant vehicle.

A seriously non-compliant vehicle is one where a vehicle would be issued with an:

- Immediate prohibition which means it cannot be driven further without remedial work;
- A delayed prohibition which means that the fault must be addressed within a short period (normally a couple of days).

Data available

DVSA carries out an annual Fleet Compliance Check survey (FCCS) of the condition of lorries (HGVs) and a survey of buses (PSVs) every other year. HGVs are stopped randomly and checked at the roadside, and PSVs are checked at operators' premises. It is possible to break down compliance by type of vehicle (HGV or PSV) and for HGV's by whether the vehicle is GB or non-GB based. We think it best to distinguish GB from non-GB drivers as DVSA has less opportunity to influence the behaviour of non-GB drivers - who often enter the country sporadically.

Comments on the measure

- Data are already collected through an existing survey so there would be no additional costs to business if the sample size and frequency of collection remained the same. Nor will there be teething problems from setting up a new data collection.
- Vehicle age and design impact on the compliance rate. DfT would make adjustments to account for vehicle characteristics in the FCCS using regression analysis.
- Because the FCCS is a survey there will be some sampling variability in the estimates produced. We estimate that 95% of the estimates produced would lie within a range of $\pm 1.2\%$ of the actual population figure. We think this is accurate enough for the purposes of the measure but could reduce the variation by increasing the sample size.
- For PSVs we might want to move from a biennial to an annual survey which would cost additional money.

Potential Measure 2: Driver Compliance Measure for HGVs and PSVs

Reason for Proposing Measure

Driver hours and non-compliance with GB/UK regulations are significant contributory factors to accidents so tackling this issue represents an important part of DVSA's work.

In the 2013/14, the FCCS estimated that the percentage of miles travelled by drivers of GB HGVs who committed hours or tachograph offences was 6.6%. For PSVs this was 5.9%.

Reducing the proportion of HGV/PSV drivers who are driving beyond their allowed hours will impact significantly on reducing accidents.

Measures

This proposed measure could be broken down into two elements:

- The estimated % of miles travelled by drivers of GB HGVs who have exceeded the number of hours they are legally allowed to drive or are using their tachograph incorrectly;
- The estimated % of miles travelled by drivers of PSVs who have exceeded the number of hours they are legally allowed to drive or are using their tachograph incorrectly.

Data

Data on driver hours and tachograph compliance are collected every year for HGVs as part of the annual FCCS and every other year for PSVs. It is possible to breakdown figures by type of vehicle (HGV or PSV) and for HGVs by whether the vehicle is GB or non-GB based.

We think it best to distinguish GB from non-GB drivers as DVSA has less opportunity to influence the behaviour of non-GB drivers - who often enter the country sporadically.

Comments

- Data are already collected through an existing survey so there would be no additional costs to business if the sample size was to remain the same. In addition there will be no teething problems from setting up a new data collection.
-
- Because the FCCS is a survey there will be some sampling variability in the estimates produced. We estimate that 95% of the estimates produced would lie within a range of +-1.2% of the actual population figure. We think this is accurate enough for the purposes of the measure but we could reduce the variation by increasing the sample size.
- For PSVs we might want to move from a biennial to an annual survey which would cost additional money.

Potential Measure 3: MOT Test Quality

Reason for Proposing Measure

The condition of a vehicle impacts on its ability to be operated safely. The MOT test is an important part of the government's approach to ensuring that vehicles are roadworthy and capable of being driven safely and it is important, therefore, that MOT tests are done correctly. It is also an important principle that drivers should have confidence in the process and believe that their car is likely to have had a good examination.

In 2013, DVSA estimated that 12.9% of tests resulted in the wrong test outcome. This represents roughly 4 million vehicles. Although many of these test conclusions related to minor faults in the testing, some related to much more serious safety issues such as inadequate brakes.

Measure

The estimated percentage of MOT tests incorrectly carried out by garages annually.

Data

DVSA already carry out an MOT Compliance Survey (MOTCS).

- This collects information on how many tests are carried out correctly across garages;
- It also provides breakdowns of the reasons for failure.
- Data are collected on an annual basis.

The survey currently only covers class 4 vehicles (cars and light vans) so would need to be boosted to cover larger vans (over 3,000kg).

Comments

- Data are already collected for cars through a tried and tested survey.
- Because the MOTCS is a survey there will be some sampling variability in the estimates produced. We estimate that 95% of the estimates produced would lie within a range of +-1.6% of the actual population figure. We think this is accurate enough for the purposes of the measure but could reduce the variation by increasing the sample size.
- There would be no additional costs if we decided to keep a confidence interval of +-1.6%. If we wished to reduce it or to cover large vans in the survey there would be some small costs to garages.
- We are not proposing that the survey focus on any one type of test. However we would wish to break the measure out into serious (eg brakes) and less serious (eg headlamps) errors.

Consultation Questions

We would appreciate your response to the following questions:

- Whether the three potential outcome measures set out in this consultation document are useful ways of monitoring DVSA's and industry's performance?
- Which of the three would work best as an outcome measure in DVSA's business plan and why?
- Whether there are any other potential outcome measures which you think should be considered and why?

How To Respond

The consultation period begins on the 19 December 2014 and will run until 6 February 2015. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/government/publications> or you can contact

Andrew Charlesworth-May if you would like alternative formats (Braille, audio, CD, etc).

Please send consultation responses online to:

<https://www.surveymonkey.com/s/DVSA-Fleet-compliance>

Consultation responses can also be sent to:

Andrew Charlesworth-May, Motoring Services, Zone 2/29, Great Minster House, 33 Horseferry Road, London SW1P 4DR.

Phone number: 0207 944 2573

Email address: Andrew.charlesworth-may@dft.gsi.gov.uk

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger

organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

If you have any suggestions of others who may wish to be involved in this process please contact us.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.