



Department  
for Transport

# Motoring Services Strategy Consultation Responses

**Moving Britain Ahead**

**March 2016**

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# 1. Introduction

- 1.1 The Motoring Services Strategy Consultation was published on 13 November 2015 and closed on 8 January 2016.
- 1.2 The consultation sought views on how the Motoring Agencies – the Driver and Vehicle Licensing Agency (DVLA), Driver and Vehicle Standards Agency (DVSA) and the Vehicle Certification Agency (VCA) continue to offer an efficient service to users and ensure that the user is at the heart of all the agencies do.
- 1.3 Questions were asked about:
  - User experience;
  - Digital;
  - Efficiency;
  - Agency transformation and
  - Deregulation
- 1.4 The questions were structured to give respondents every opportunity to talk about their experiences and ideas, rather than simply to provide ‘yes’ or ‘no’ answers or an indication of support using the Likert scale<sup>1</sup>. Respondents were also encouraged to make any observations and suggestions concerning the motoring agencies which were not covered by the questions. Volumes of responses have been indicated where respondents have specifically commented on a particular issue, however we cannot conclude if this reflects wider support or disagreement for a proposal. This analysis, therefore, does not provide a percentage scale indicating support for the proposals i.e. 68% of responses strongly agreed/disagreed with proposal X.
- 1.5 Respondents took the opportunity to share their views on a number of unsolicited, but related, motoring and learning to drive topics. These remarks have been reflected in this document.
- 1.6 The consultation received 258 responses, and 76 comments on social media (DVSA Facebook and Twitter). An hour long web-chat with Approved Driving Instructors prompted 180 comments. Many of the comments made during the web-chat and on Twitter and Facebook were similar in nature to the consultation responses.
- 1.7 Responses have been received from:
  - Members of the public, including learner, novice and experienced drivers;
  - Approved driving instructors and their trade associations;
  - Vehicle manufacturers and dealerships;
  - Garages;
  - Bus and haulage operators and their trade associations;

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<sup>1</sup> Commonly a 1 to 10 scale to indicate preference or support

- Staff members (including driving test and vehicle examiners) from the Agencies and
- Nine key stakeholders who attended a round table meeting with Lord Ahmad in November 2015:
  - AA;
  - RAC Motoring;
  - Freight Transport Association;
  - Road Haulage Association;
  - British Rental and Vehicle Leasing Association;
  - Society of Motor Manufacturers and Traders;
  - Confederation of Passenger Transport;
  - Parliamentary Advisory Council for Transport Safety;
  - Driving Instructors Association.

## 2. User Experience

### A new approach to driving tests

Q1 As we change the practical driving test to ensure it reflects the modern driving experience, what views do respondents have about how we can maintain standards and give candidates clear information about the competences tested in the driving test?

- 2.1 The questions about learning to drive and the driving test elicited the most responses and additional comments and suggestions.
- 2.2 Respondents suggested:
  - the practical car test should be an assessment of competence to drive rather than a fault-based test; [13 respondents specifically mentioned this]
  - increasing the independent driving element of the test or making the test longer;
  - more emphasis on ensuring learners understand the importance of taking account of the needs of vulnerable road users. This was of particular importance to cycling and motorcycling interests;
  - revisions to some of the elements of the test;
  - better and more targeted communications with learners, for instance to sign-post them to on-line resources, provide information about driving competences. [7 respondents specifically mentioned this]
- 2.3 Britain has some of the lowest road casualties in the world, with only Sweden being a safer place to travel by road<sup>2</sup>, given this some respondents questioned whether the first time pass rate of around 46%<sup>3</sup> actually indicates there is a problem with the driving test in its current form
- 2.4 While support was expressed for the changes DVSA is currently trialling for the driving test content, other respondents considered that reducing the number of required manoeuvres was not a good idea. They said that the test should be more challenging, testing candidates' anticipation skills and ability to drive at higher speeds.
- 2.5 The RAC Foundation, while expressing support for developments that see the test better reflect real-world driving, *would like to see priority given to accelerating the programme.*
- 2.6 The ADI web chat also prompted suggestions that the test should be more stringent – including a suggestion that the maximum number of faults allowed be decreased and, where practicable, include driving on rural roads.

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<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/487949/british\\_road\\_safety\\_statement\\_web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487949/british_road_safety_statement_web.pdf)

<sup>3</sup> <https://www.gov.uk/government/collections/driving-tests-and-instructors-statistics>

## Q2 Driving tests might be offered from a wide range of venues. What factors should be considered in deciding on these?

- 2.7 40 respondents mentioned specific factors that needed to be considered. They were particularly concerned that access to suitable test routes, to ensure a consistent test, was of paramount importance. Respondents expressed consensus in locations have suitable facilities for candidates and driving instructors (toilets, waiting area) and that access to refreshments would be welcome. A secure area for driving examiners was also identified as important.
- 2.8 One response mentioned a trial undertaken by DSA (as was) to determine the suitability of alternative locations from which tests might be conducted. They suggested that those findings be taken into account in any future considerations.
- 2.9 If tests were to be offered outside normal working hours/locations, some respondents queried whether there would be sufficient numbers of examiners willing to conduct those tests.
- 2.10 6 respondents specifically expressed concern that certain routes or times of test (for instance weekends) might have significantly different traffic conditions than at other times. They thought there was a risk that the test at those times might be perceived as 'easier' and attract more bookings.

## Q3 We are interested to hear whether respondents would be willing to pay extra for more flexibility of driving test slots, both in terms of timing and location.

- 2.11 Respondents pointed out that the flexibility for weekend and evening slots was already in place. Although some caveated that statement with comments that appointment times were rarely available.
- 2.12 15 respondents considered there was no justification for charging an increased fee for more flexibly timed or located tests.
- 2.13 7 respondents said they thought candidates would pay more for the convenience of a test in the evening or weekend, provided they did not gain an advantage of an 'easier' test and that the additional fee covered the cost of the service and did not generate additional income.
- 2.14 7 respondents thought that a 'premium' service might attract a higher fee. They expected this would offer something extra, for example a home pick up.
- 2.15 Passenger transport and haulage industry stakeholders expressed interest in similar flexibilities being offered for vocational tests.

## Waiting times

- 2.16 Although not specifically raised in the consultation paper, a significant number of respondents [23], many of them driving instructors, linked candidates' booking behaviours with waiting times for tests. They considered that a waiting time longer than 6 weeks encouraged candidates to book a test in anticipation of being properly prepared by the time of the appointment. Respondents also said that candidates who were not fully test-ready were reluctant to postpone or rebook a test if there was a long wait for the new appointment date. Responses from a number of recent driving test candidates expressed frustration at last minute cancellations by DVSA which led to additional waiting time for the re-booked appointment.
- 2.17 18 respondents stated that more examiners were needed. Some also suggested that DVSA needs to review service provision.

#### Q4 What could be done to ensure that candidates are better prepared for their practical test?

2.18 12 driving instructors said that they did not submit pupils for tests until they were ready. They went on to comment that attitude sometimes causes friction between the instructor and pupil and their parents, with an accusation that the instructor is 'out to make money' and the pupil then goes ahead to take a test in their parents' car regardless of their instructor's advice. Anecdotes about less scrupulous instructors who allow their pupils to take the test when they are not fully prepared were also reported.

2.19 Suggestions to ensure candidates are better prepared for their practical test:

Suggestion	Responses
Minimum number of hours practice or driving lessons	29
Log book signed off by instructor confirming candidate has satisfactorily completed structured training plan elements	13
Tests can only be booked by or attended with an instructor	3
Instructor certifies candidate as competent to take test	6

2.20 Post-test driving competence was also considered important by respondents:

18 considered some form of graduated licencing or restrictions should be introduced.

12 wanted more emphasis on Pass Plus or consideration of compulsory post-test training/assessment. The current relatively poor take up of Pass Plus was, in some measure, felt to reflect the lack of insurance premium discounts in recognition of additional training.

3 instructors felt compelled to comment on intensive driving courses – they considered such courses did not provide sufficient on-road driving experience and called for them to be banned.

19 respondents felt that the poor standard of instruction provided by some ADIs needed to be robustly addressed. Suggestions made included: priority is given to standard checks - that they are conducted at more frequent intervals and that DVSA needs to do more to identify and remove poor performing instructors from the Register<sup>4</sup>.

2.21 Comments on ADI web chat included:

- Publish the candidates' pass rates for individual instructors;
- There should be a higher standard for the standards check;
- Driving tests can only be booked by the instructor.

#### Q5 Would a financial incentive encourage learners to sit the test when they have better chance of passing?

#### Q6 At what level should such an incentive be set?

2.22 40 respondents did not agree with this proposal. 4 thought it was a good idea. 11 respondents thought it might encourage candidates to better prepare, provided the

<sup>4</sup> The names of approved driving instructors are required to be entered on to the Register of Approved Driving Instructors, maintained by the Registrar, on behalf of the Secretary of State for Transport.



cash incentive was sufficiently high, but that the cost to administer such a scheme would need to be considered.

2.23 Alternative suggestions for incentives were to increase the cost for any subsequent tests and to extend the mandatory waiting time before an unsuccessful candidate can attempt their next test. Some thought the insurance industry could offer incentives by way of discounted premiums for additional post-test training.

2.24 Reasons given for objecting to the proposal:

- The cost of the test is sufficient incentive;
- It's a gimmick;
- Many candidates who have been assessed by their instructor as prepared to take the test suffer from pre-test nerves – this might add to that, particularly with the potential to lose a deposit;
- This is a punitive measure that will affect candidates who are less well off;
- This won't change a culture among some candidates to pass the test as soon as possible or persuade them to take more lessons;
- Overall cost of learning to drive means there is a financial pressure on some candidates to take the test before they run out of money, this will add more pressure to pass so they don't lose their deposit;
- Doesn't support learners who have learning disabilities or other mental or physical health conditions;
- Focussing on passing the test may not be helpful – not everyone who passes first time is necessarily safest;
- The pass rate is not really a problem and it's similar to the pass rate of potential driving instructors.

2.25 The overall response from participants during the ADI web chat was negative. The comments made echoed those received to the consultation:

Long waiting times encourage candidates to apply for the test too early;

- It will increase the stress of taking the test, particularly for candidates with lower incomes;
- It will focus candidates on passing the test, rather than acquiring the skills to ensure 'Safe Driving for Life'.

**Q7 What opportunities and risks would respondents see in alternative delivery models for aspects of the practical test?**

2.26 Some respondents queried whether alternative delivery models would be in addition to or instead of DVSA delivered tests.

2.27 12 respondents felt that the practical test should continue to be provided as a government delivered service. The integrity of examiners was acknowledged and respected and the impartiality of public service delivery was valued. Most of the respondents who expressed this opinion were individuals. The PCS and Prospect unions did not support alternative delivery models.

2.28 21 respondents, including the AA, Parliamentary Advisory Council for Transport Safety (PACTS), RAC Ltd, Driving Instructors Association (DIA), either supported or saw no reason not to support alternative delivery models. It might offer opportunities

for more flexibilities for candidates and create commercial partnership opportunities between transport operators and voluntary or road safety organisations.

2.29 Aligned to both views were concerns that it was vital that the standard and integrity of the test and testing must be maintained. DVSA were identified as the appropriate body to quality assure and audit any third party delivering the test.

2.30 Respondents also flagged the following issues for consideration:

- Conflicts of interest if training bodies were authorised to deliver tests;
- Conflicts of interest between commercial viability and road safety;
- Differing fees and inconsistent standards in the event more than one provider delivered tests;
- Concerns about future fee increases being driven by profit;
- Providers might 'cherry pick' densely populated areas to the detriment of service provision in rural or remote locations;
- Ensuring appropriate training for examiners was available and endorsed;
- Shareholders prioritising profit, possibly compromising safety;
- Candidate impersonation and other fraudulent activities.

#### Extending the delegated examiner regime.

2.31 Respondents were also interested to see an extension of the existing delegated examiner regime to allow practical vocational driving testing of other operators' employees. Haulage operators in particular were keen, seeing this as an opportunity, given the restrictions currently in place regarding the minimum number of tests which a delegated examiner must conduct each year.

#### Q8 What factors are likely to attract potential partners to provide a practical driving test service.

2.32 21 respondents suggested that a financial or profit incentive would likely be the only factor to interest potential providers.

2.33 Small numbers of respondents considered that providing practical tests might enhance a company's reputation or that it might fit with their existing business model or utilise spare land. They also mentioned that not for profit road safety organisations might be interested.

## A new approach to commercial clients

#### Q9 What are the most important linkages we should make to streamlining the LGV driver licensing process, while ensuring standards are maintained?

2.34 7 respondents, including Confederation of Passenger Transport (CPT), Road Haulage Association (RHA) and Freight Transport Associations (FTA) expressed support for streamlining the LGV driver licensing process, suggestions how that might be achieved included:

- Create one body with oversight of vocational licence applications and testing;
- Incorporate Certificate of Professional Competence (CPC) Module 4 with the practical licence acquisition test – candidates have the opportunity to opt out if they do not intend to drive professionally;

- Allow CPC Module 4 to be conducted by approved trainers;
- Develop an on-line process to apply for a provisional vocational licence and to check progress of the application.

2.35 Respondents also stressed the need to maintain standards.

Q10 Do respondents believe that the on-road and manoeuvring components of the LGV driving test could be conducted separately and be of benefit to the haulage industry?

2.36 20 respondents who expressed a view agreed; 6 did not.

2.37 Respondents commented:

- this would be more efficient for trainers as it would allow more than one candidate to be taken for test at the same time;
- potential for creating additional delays if examiner resources were not sufficient;
- may not be a benefit for testing programmes conducted by delegated examiners;
- authorise trainers to test the manoeuvres elements;
- possible scope for increasing the number of test delivery sites by exploring whether operators' sites might be suitable from which to locate manoeuvres tests.

Q11 We would be interested to hear suggestions on how the Drivers Medical service might resolve cases more quickly

2.38 Although respondents were keen to speed up the decision making process, they were also clear that this should not be at the expense of taking risky shortcuts.

2.39 6 respondents suggested that the DVLA Drivers Medical team needed more resource to cope with demand, and anticipated that an aging population would increase demand on the team – both for vocational and over 70 years of age licence renewals.

2.40 Digital developments were seen as a way to speed up processes:

- Permit scanned and emailed medical declarations;
- Develop on-line declarations from GPs to replace form D4;
- Permit straightforward medical licence renewals on-line;

2.41 Respondents thought that better communication with, and guidance for, GPs was required. While considering that more use could be made of DVLA medical experts, respondents also queried why further investigation was required if a driver had been certified by their own GP as fit to drive.

2.42 Some respondents were concerned to ensure that employers and trainers did not inadvertently permit someone to drive if their licence has been revoked because of a medical condition. It was suggested that DVLA notify the driver's employer directly of that decision.

Q12 What more can we do to meet the needs of users, so that vehicle testing services could continue to meet the industry's needs?

2.43 Although the Authorised Testing Facility (ATF) network has been broadly welcomed by those respondents who provided comments, it was suggested that ATFs do not always have slots available and it is sometimes difficult to identify an alternative, suitable local ATF. A single, central booking system was suggested as a means to overcome that issue.

- 2.44 Heritage vehicle interests were concerned that an expansion of the ATF network would mean fewer testing locations with the facilities to test these vehicles.
- 2.45 Transport operators and vehicle leasing businesses suggested they would benefit from increased transparency. One respondent considered it would be helpful if the data concerning common causes of annual testing failures by specific faults per vehicle type could be made available so that remedial actions might be considered as part of regular maintenance regimes.

Q13 Would an expansion in the number of LGV testers to include private sector testers be welcomed? Does industry have the appetite and capability to provide such an expansion?

- 2.46 18 respondents, including trade associations and operators, expressed their support for this proposal. Many operators are authorised ATFs, they considered that permitting private sector testing would enable them to maximise their investment, give them more flexibility which will result in savings.
- 2.47 11 respondents, mainly individuals and trade unions, did not agree as they considered it risked abuse. They called for more DVSA testers
- 2.48 Respondents expressing both views were concerned that standards should not be allowed to drop and appropriate checks and audit regimes must be in place if the proposal is adopted.

2.49 Other comments made:

- Many vehicle technicians are already highly qualified and so it should be relatively straightforward to provide them with the appropriate testing skills;
- Testers should be licenced to ensure they are properly qualified and accountable;
- Preventing self-testing of an operator's own vehicles was not supported and the business structure of some operators, who operate their own maintenance companies as separate entities, could, in any case, make it difficult to enforce;
- Private testing notwithstanding, it remains the Government's responsibility to ensure adequate provision of testing services and also the expertise to test heritage vehicles.

Q14 Is there an appetite amongst LGV/PCV operators to be involved in an 'earned recognition' enforcement scheme? What more do you think DVSA could do to process vehicles more quickly through roadside checks?

Q15 Are there other ways in which DVSA could better target enforcement on non-compliant operators?

- 2.50 12 respondents expressed support for this proposal. There were no objections. Respondents commented on the need for targeted compliance and enforcement activities. They considered that DVSA officials needed access to digitised information about operators and software that allows them to scrutinise drivers' records.
- 2.51 Although in general supportive of the concept of 'earned recognition', some respondents were concerned that it should not be seen as an alternative to roadside enforcement activity. They were concerned that without the possibility of a random roadside check operators might become complacent regarding some aspects of vehicle maintenance. It was also pointed out, and this was of more concern to respondents, that a minority of operators might be tempted to falsify digitised vehicle maintenance records, in an attempt to mislead DVSA officials.

- 2.52 Some respondents stated that earned recognition should also be available to smaller operators, and that sophisticated IT systems should not be a criteria for application for earned recognition status.
- 2.53 Better partnership working with the police and Traffic Commissioners to share information was also considered important.
- 2.54 Respondents were not keen that the costs of enforcement to tackle non-compliant operators were passed on to those that do comply.
- 2.55 There was some support for an element of the van MOT fee to support roadside compliance, although it was considered further consultation was required.
- 2.56 A suggestion was made that earned recognition status should be extended to the light goods sector.

#### Q16 What would be the best way(s) to ensure that commercial users are kept abreast of developments in the agencies?

- 2.57 Better communication with commercial users was welcomed and seen as essential. With virtually all commercial users having an on-line presence, many respondents suggested that they provide at least one email address for updates to be sent from the agencies.
- 2.58 Other suggestions included:

Clear and easy to understand communications setting out changes;

- More interactions with trade associations to promulgate messages;
- Joining up communications with the Traffic Commissioners;
- Better availability of information for new operators to help them clearly understand their responsibilities;
- Regular roundtable discussions between the agencies and commercial organisations.

#### LGV driver shortage

- 2.59 Some respondents also commented on the LGV driver shortage. They suggested that, in part, this was down to relatively low wages and conditions that often mean drivers working long hours and being away from home. The costs of training were seen, for some, as a barrier to consider driving as a career. The availability of apprenticeships was seen as a way forward.

## 3. Improving the digital experience

Q17 What more could be done to expand and increase the use of digital services offered by the motoring agencies and what should be done for those who cannot choose not to use a digital service?

- 3.1 There was strong feeling that people who cannot access digital services, because of lack of skill, IT equipment or because of poor connectivity, should not receive a poorer service. Older people and those who live in remote areas or are less well-off were identified as those who would be most likely to need support.
- 3.2 Respondents saw the continuation of a telephone contact centre as vital. Some driving instructors were concerned that it can take a long time for their call to be answered, which has an impact ons their time management. Comments were also made about the restrictions to DVSA's contact centre opening times.
- 3.3 Respondents called for a 'one stop shop' so there is no unnecessary duplication of information. A single log-on for operators to access all relevant IT systems would be welcomed.
- 3.4 Improvements to IT systems were seen as key, suggestions included:
  - Improve digital processes and reduce paper transactions for commercial users and operators;
  - Enable refunds of Vehicle Excise Duty (VED) to be made direct to bank accounts rather than by cheque;
  - Improve digitisation for Automated First Registration and Licensing (AFRL);
  - On-line improvements for cherished number plate transactions;
  - Introduce a digital fast-track for applications to replace faulty tachograph cards;
  - More convenience for employers and operators to access drivers' licence and CPC records for checks;

Q18 In the past, services requested by industry groups have often not been used to the level forecast. How can we incorporate their requests into service design?

- 3.5 There were some critical responses to this question, indicating that, in some cases, industry groups felt they had not been sufficiently consulted during the development stages and so the resulting service had not fulfilled their needs properly. They called for full involvement and extensive testing to ensure changes and new developments are fit for purpose for commercial users.

Q19 In providing assistance to those accessing digital services, are the agencies providing the right kind of assistance? Would web page pop-up assistance be valued? Would guidance for those assisting users (in, say, community centres, council offices or job centres) be more helpful?

- 3.6 There were no objections to introducing pop-up assistance and references were made to it commonly being used for other services. However some respondents

queried whether there is any evidence to suggest that this is required for some of the regularly used straightforward transactions. Anything more complicated, where it is likely assistance would be required, generally results in a telephone transaction.

- 3.7 Given recent budgetary reductions for some local authority services, respondents doubted whether options for assistance in libraries etc was feasible. Respondents thought that reliance on these services to assist users, together with any corresponding reduction in telephone contact centres would be likely to further penalise people who already had difficulties accessing services digitally.

Q20 Is there a demand for developing and publishing an application programme interface (API) for fleet management software developers to build on? If so, which services should it cover? Is there industry appetite to lead on this work?

- 3.8 There was some enthusiasm for this proposal, with operators identifying benefits with improved and efficient processes for:

- Bulk licence applications;
- Bulk SORN applications;
- Real time performance information e.g. fuel consumption;
- MOT and testing information;
- VED applications for fleets.

- 3.9 There were no clear views expressed on whether public or private sector should take the lead on this.

Q21 Would smartphone or tablet applications for drivers and owners be welcomed? Would the public sector be best placed to provide such services?

- 3.10 16 respondents agreed that apps should be developed for both targeted communications and for transaction purposes, for example reminders for MOT, insurance and VED and to sign-post commercial users to information about changes. It was also pointed out that some apps to provide this sort of information have already been developed by the private sector.



## 4. Efficiency

Q22 Are there any social or economic factors which the fees review should consider in proposing either to reduce or to increase fees for these services in the future?

- 4.1 There was broad agreement that the fee set should cover the cost to deliver the service and that the 'user pays' principle should continue to apply. Covering the cost for investment in future developments, technology and capital replacement were considered important. Likewise, transparency so users could see that fees are set fairly to all customers and reflect the value of the service they receive.
- 4.2 Some concerns were expressed that any fee increases might result in people driving or operating illegally.
- 4.3 There were suggestions of a number of activities and services that might benefit from a review of the fee regime, for instance technical test fees, the pit fee charged by ATFs and how quality assurance of the Compulsory Basic Training scheme for learner motorcyclists is financed.
- 4.4 Some respondents thought that fees for operators should better reflect a responsible attitude and practical commitment to environmental responsibilities.

Q23 Should fees more closely reflect the differential cost of service provision by different channels?

- 4.5 5 respondents thought this was a reasonable proposal. The Traffic Commissioners mentioned poorly prepared operator applications which required significantly more interventions than those that provide all the requested information at the outset.
- 4.6 13 respondents disagreed, they thought differential fees would have a bigger impact on small businesses who would be forced to pass on costs to their customers. Again, it was felt that those customers who are unable to access services digitally, because of connectivity issues etc, should not be financially penalised by higher fees.
- 4.7 Where digital developments have cut down on agencies' interventions and costs it was felt that fees should be adjusted to reflect those savings.



## 5. Agency transformation

Q24 We would be interested to hear from respondents what operating models for the agencies would best promote ever increasing efficiency, improve user service, maintain standards and deliver accountability to Parliament.

- 5.1 There were few responses to this question.
- 5.2 Respondents thought that any proposals to merge the DVLA and DVSA contact centres should ensure expertise is maintained and consider a dedicated contact line for operators.
- 5.3 Any independent review of DVSA, following the merger of DSA and VOSA, should not recommend any further changes until the agency's merged operations have stabilised.
- 5.4 There were no strong views on merging back-office functions for the agencies, provided customer service does not suffer. There was an expectation that any merged Finance or HR functions would lead to a corresponding reduction in senior management roles.
- 5.5 No support was expressed for mutualisations.

Q25 We would value views from respondents with experience of VCA operations overseas on the value VCA adds to business or the automotive sector through such operations.

Q26 We welcome views from industry about the services currently provided by VCA in the UK and overseas, its effectiveness in supporting users and growth in the sector and whether the existing operating model should be retained.

- 5.6 There was broad support for VCA, it is seen as widely respected, its impartiality is valued and its services are considered to support GB businesses and promote growth. However, there was also some criticism about waiting times for test dates and a perceived lack of uniformity in the application of some test requirements.
- 5.7 Most respondents supported the current operating model, they thought the combined service model was effective. While they did not see the need for major changes they welcomed a commitment to continuous improvement.
- 5.8 At least three responses said that VCA approvals for vehicle components manufactured overseas were seen as supporting UK businesses, another said that VCA was their certification agency of choice - even when others were available. One response said they considered *approvals issued by the VCA from overseas to carry an assurance of conformity and technical performance*.
- 5.9 VCA is seen as key to rebuilding confidence in the automotive industry, following the recent revelations about vehicle emissions.

## 6. Deregulation

Q27 Are there any other areas of regulation administered or enforced by the motoring agencies, which you consider should be reviewed and potentially be safely reduced during the next four years?

- 6.1 There was support for the suggestions in the Consultation to allow driving instructors to re-enter the Register by successfully completing a standards checks, changes to the type of load to satisfy the Real Total Mass requirements for vocational tests and extending the approval period for Driver CPC courses.
- 6.2 11 respondents objected, mainly on safety grounds, to the proposal to extend from 3 years to 4 for a car's first MOT. It prompted a suggestion from an industry group for annual MOTs for light goods vehicles.
- 6.3 Other suggestions included:
  - Permit the payment of more than one year's VED;
  - Remove the £2.50 per transaction credit card charge if paying VED for more than one vehicle;
  - De-regulate fees but retain the obligation to consult;
  - Remove what is perceived as a now out-dated application requirement for operators to advertise in local newspapers;
  - Allow driver training of full licence holders to be exempt from the requirement to be conducted by approved driving instructors; and conversely;
  - Ensure all training (off-road, advanced, coaching) is fully compliant with the requirement to be delivered by approved driving instructors;
  - Include driver training and instruction in attitudes to driving in the national curriculum for schools.