



Motoring Services Strategy

RAC Response to the Department for Transport Consultation

ABOUT RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,500 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country's road networks are managed and maintained.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at www.rac.co.uk

SUMMARY OF RESPONSE

- The RAC welcomes DfT's review of Motoring Services. Within the consultation there are a number of measures seeking to modernise the service to provide motorists with more choice when it comes to taking their practical driving test. According to the response to an FOI request by RAC, the average waiting time between booking and taking a practical driving test 7.8 weeks (as of 14th December). This represents a rise on the 6.5 week average waiting time recorded for the financial year 2014/15. The RAC believes some of the measures outlined should provide motorists with greater choice, and as such, should drive down average waiting times and possibly costs. There must, however, be a clear set of guidance published and steps to make sure the system is not open to abuse. It is essential that current standards are not only maintained, but also improved. There must also be no conflict of interest between those organisations conducting lessons and the practical driving test.
- The RAC also welcomes proposals for the wider availability of digital services. However, there remains a minority of road users who are uncomfortable with, or have limited access to digital services and their needs must be recognised and accommodated.
- On the future of the VCA, and with the VW emissions scandal still at the fore, we urge the Government to exercise caution before making changes to the VCA.

FULL RESPONSE

1. 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 competencies tested in the driving test? (para 2.4)

The RAC welcomes the Department for Transport's review of Motoring Services. We believe that current driving test standards in the UK are of a good level and this is reflected in the fact that road casualty rates in the UK are amongst the lowest in Europe.

The Government may also wish to consider whether testing takes sufficient consideration of driver concerns. Indications from the 2015 RAC Report on Motoring show that many motorists worry about the standards of certain aspects of other driver behaviours; for example, drivers who use their mobile phones to talk, text or use the internet are right at the top of the most significant issues of overall concern to motorists this year with just over a third (34%) ranking these potential dangers as one of their top four issues of concern. Whilst arguably, such behaviour can better be discouraged through the theory test rather than the practical test.

Research for the 2014 RAC Report on Motoring found that when it comes to driving in demanding weather conditions such as heavy rain, snow or ice, many motorists feel distinctly uncomfortable with many actually avoiding driving altogether in these situations. Eight in 10 (79%) motorists admit to feeling uncomfortable driving on icy roads and 95% of those try to avoid driving when it's icy. Seventy two per cent of drivers are uncomfortable driving when it is snowing with the majority of them (96%) avoiding driving in these conditions whenever they can. Training and practical experience should thus try to focus on how to make drivers more prepared for trickier conditions, such as adverse weather conditions or driving at night, for example.

2. Driving tests might be offered from a wide range of venues. What factors should be considered in deciding on these? (para 2.7)

The RAC believes that making it easier and more convenient to take a driving test is generally welcome. For those booking a driving test, they may have to wait up to 3 months between booking and taking their practical test. This is understandably a source of frustration for learners, and can result in some learners taking their test before they are ready to do so. This arises because it is necessary to book the test a long time in advance and the learner has to estimate when they will be ready to take the test. If by the time they reach their test appointment, they are not yet ready, the temptation is to take the test anyway because the learner will have to wait so long for an alternative test appointment.

The RAC is not opposed to opening up the conducting of tests to external providers as long as the following safeguards are in place:

- There must be a clear and unequivocal set of national standards as to how tests should be conducted which must be adhered to rigorously by all practical driving test providers. The standard should be set in a similar way to those currently in place for vehicle roadworthiness (MoT) testing.
- The system must not be open to abuse. DVSA would need to establish a comprehensive Quality Assurance process that ensures consistency and adequacy of standards and commands the confidence of the motoring public.

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. (para 2.8)

The RAC would be happy to conduct a survey using its panel of over 7000 motorists should this be seen as helpful. At present we have no data available as to whether learners would be willing to pay for greater flexibility, though giving them choice and flexibility over when and where they take their test can only be a good thing and most motorists would, we suspect, regard a small supplement for evening or weekend testing as fair.

3. What could be done to ensure that candidates are better prepared for their practical test? (para 2.10)

The RAC believes that a pass rate of 50% doesn't necessarily indicate a problem with the practical driving test itself. A sudden increase in pass rates might lead to accusations that the tests are getting easier or that the standards of examining are worsening, so it is important that the tests and standards remain both high and rigorous.

There is a direct linkage between this question and the earlier response on waiting times for tests. If waiting times for a test are reduced, students will delay booking a test until they are ready to take it. They will also be more willing to cancel a test if they find they not yet ready to take the test when the test appointment arrives.

Financial incentives may be a useful tool to encourage learner drivers to undertake more practice before taking their practical test. This need not necessarily require a learner to take more lessons but would encourage them to undertake more practice supervised by friends or family. We understand that some trialling has been undertaken with log books to record both lessons and practice and the RAC would like to see all learner drivers and their instructors complete an electronic log book that records relevant information. The RAC also believes that there may be a role for telematics as a tool to improve driving standards before as well as after the practical test.

Research from Consumer Intelligence published in June 2015 found that take-up of telematics insurance was highest among drivers aged between 18 and 24, with 22% of men in this group and 14% of women using such policies. Much of this interest will be driven by reduced insurance premiums, thus linking lower costs with increased take-up, which could help drive extra practice ahead of younger drivers taking their practical driving test.

4. What opportunities and risks would respondents see in alternative delivery models for aspects of the practical test? (para 2.12)

In terms of opportunities, alternative delivery models for the practical driving test should allow for greater choice and flexibility, and should also bring down the average waiting times for learners booking their practical driving tests. As stated above, this in turn, may reduce the risk of learners rushing to book their tests as they will know that waiting times are short.

5. What factors are likely to attract potential partners to provide a practical driving test service? (para 2.14)

Organisations will inevitably be drawn to provide practical driving tests for a number of reasons. These may be reputational, financial and/or to drive up road safety and driving standards. DVSA clearly needs to develop a business model that attracts organisations with credibility and integrity to partner with them.

We believe that it will be essential to avoid conflicts of interest. We do not, for example, believe that an organisation with ownership of driving schools would be an appropriate organisation to undertake testing on behalf of DVSA.

6. What are the most important linkages we should make to stream-lining the LGV driver licensing process, while ensuring standards are maintained? (para 2.17)

The RAC does not feel in a position to answer this.

7. 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? (para 2.19)

The UK faces a significant shortage of LGV drivers with an aging LGV driver population and relatively few younger people being attracted by an LGV driving career. Any measures that add flexibility without eroding standards are welcome as they may contribute to attracting more young drivers to become licensed to drive LGVs

8. We would be interested to hear suggestions on how the Drivers Medical service might resolve cases more quickly. (para 2.23)

The RAC welcomes the DVLA's review and pilot on improving processes to deal with cases where a driver has declared a medical condition; It is in the interests of all parties that cases are dealt with swiftly both to protect the safety of all road users and also to ensure that drivers do not lose their license for longer than is justified by the evidence.

9. What more can we do to meet the needs of users, so that vehicle testing services could continue to meet industry's needs? (para 2.25)

The RAC believes that Government needs to consider putting operators at the heart of its offering in terms of time and location when tests can be carried out. In a market which is critical to the UK economy and where downtime comes at a premium, perhaps users would welcome a more flexible approach.

10. 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? (para 2.27)

The RAC is not in a position to comment on this.

- 11. Is there an appetite amongst LGV/PSV operators to be involved in an 'earned recognition' enforcement scheme? What more do you think DVSA could do to process vehicles more quickly during roadside checks? (para 2.30)**

It makes sense to target enforcement at vehicles/operators whose track record suggests that they are most likely to be operating illegally. If an earned recognition system assists in this process then it is likely to be welcomed.

- 12. Are there other ways in which DVSA could better target enforcement on non-compliant operators? (para 2.31)**

The RAC has no further comment to make here.

- 13. What would be the best way(s) to ensure that commercial users are kept abreast of developments in the agencies? (para 2.33)**

The RAC believes agencies should consider twice yearly or quarterly roundtables with commercial organisations to keep them abreast of developments which may impact upon them. Highways England and Transport Focus currently operate similar roundtables to both inform and gather feedback from stakeholders and trade bodies.

- 14. 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 or choose not to use a digital service? (para 3.5)**

The RAC welcomes the wider availability of digital services. However, there remains a minority of road users who are uncomfortable with, or have limited access to digital services and their needs must be recognised and accommodated. This is an issue that affects all Government departments who wish to achieve efficiencies by introduction of digital services. It may be appropriate to consider local solutions where, for example, help might be available in libraries or post offices to assist members of the public to undertake transactions with Government departments or Agencies digitally.

- 15. 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? (para 3.6)**

The RAC is not able to comment on this.

- 16. 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? (para 3.8)**

In our view, the main barriers are associated with individuals who do not want to transact digitally or have limited access to the internet. Whilst better on line guidance and assistance is always welcome, it will not in isolation persuade those who currently do not use digital services to overcome their concerns. See our response to Question 15

17. Is there a demand for developing and publishing an application programming interface (API) for fleet management software developers to build on? If so, which services should it cover? Is there industry appetite to lead this work? (para 3.10)

There is a demand within Fleet operators for real time information relating to all aspects of performance – fuel economy, location, driver behaviour – across a wide range of vehicles on UK roads. RAC is involved and part of a number of initiatives related to aftermarket telematics at both consumer and corporate level. Thought must be given to the security and use of this data ensuring congruence with the Data Protection Act and other relevant legislation.

18. Would smartphone or tablet applications for drivers and owners be welcomed? Would the public sector be best placed to provide such services? (para 3.12)

The RAC would welcome a move towards smartphone and tablet applications. Agencies should consider alternative ways they can remind drivers of when their car tax or MOT is due such as via smartphone apps. Since the removal of the paper tax disc, early data published by the DfT suggests that the number of unlicensed vehicles on the road as a proportion has increased from 0.6% in 2013 to 1.4% in 2015, suggesting an estimated half a million untaxed cars on the road.¹

Paper reminders on taxation currently exist, so it would be for agencies to decide whether smartphone and tablet apps can supplement this.

19. 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? (para 4.8)

The RAC believes that moving processes towards an online platform should result in lower costs which should be passed on to the motorist in reduced fees. The RAC therefore supports the Government's moves to conduct a review of agency fees to make sure they are reflective of the agency's operational costs and that motorists are getting the best value-for-money and service.

20. 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. (para 5.2)

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/479992/ved-2015.pdf

The RAC believes there are sensible proposals outlined in the consultation document. Allowing third parties to conduct practical driving tests, for example, can help improve efficiency and reduce costs for motorists.

We advocate the application of benchmarking with the private sector and with overseas public sector organisations wherever possible to highlight improvement opportunities. We believe that a failure to do so in the past has led to unnecessary cost and inefficiency.

- 21. 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. (para 5.10)**

The RAC is not qualified to answer this question.

- 22. 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. (para 5.11)**

We urge caution when considering changes to the current VCA operating model. The recent VW scandal has served to highlight the important role the VCA plays. The priority must be to ensure the VCA helps to re-establish emissions standards that reflect real world vehicle operation and rebuild consumer trust in the industry.

In November 2015, the RAC surveyed an online panel of motorists following the emissions scandal and the results showed that it has damaged motorists' trust in all vehicle manufacturers' environmental claims with six in 10 drivers (57%) saying they have lost confidence since the news broke². The VCA can make a substantial contribution in rebuilding public confidence in the manufacturers' claims, and it is only when this has been achieved should the Government consider making changes to the VCA's operations.

- 23. 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? (para 6.13)**

The RAC believes that all of the agencies have vitally important roles, however, with the nature of public spending as it is, understand there may be a need to consolidate some operations. We believe that this should be part of a separate Government consultation.

² <http://www.rac.co.uk/press-centre#/pressreleases/motorists-not-put-off-diesel-by-vw-emissions-scandal-1260714>



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