

Response from:

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## **THE ORGANISATION**

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

## **WHO WE REPRESENT**

MSA GB is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (DVSA ADIs). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors and represent their interests together with those of potential driving instructors and a number of bus/coach instructors and motorcycle instructors. MSA GB is the voice for around 6,400 driver/rider trainers.

## **HOW WE GATHERED VIEWS**

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

## **GENERAL COMMENTS**

The consultation asks a number of questions under five headings Digital; Efficiency; Agency Transformation and Deregulation. There are about half a dozen questions directly related to road safety and others that are relevant to driver trainers. It seems the principal new proposal is the introduction of a financial incentive to encourage people to only take their driving test when they are confident that they have a high chance of passing.

Many driver trainers found the contents of the video accompanying the consultation to be patronising, have poor content and shocking continuity.

## **PUBLICATION OF MSA GB COMMENTS**

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

## **QUESTIONS WE HAVE ANSWERED**

We have only responded to those questions we believed relevant to our members.

## **CONSULTATION QUESTIONS (in bold)**

**As we change the 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?**

This question seems to suggest that the L-test is going to be changed regardless of the result of the trial. The MSA GB fully support the changes being trialled but phrasing the question in this way suggests the changes are a done deal, so why bother with a trial?

As to the second half of the question we are unsure much more can be done than is already being done. The question seems to suggest that driver trainers are not giving candidates clear information at the moment. That is not true: driving schools and driving instructors are disseminating information to pupils and there is a wealth of information available on line and in printed form but few learner drivers are prepared to read it and because there are few group learning sessions where competencies can be discussed, few learners absorb the knowledge.

The next question concerns reducing waiting times for car and LGV practical driving tests, by offering a more flexible service. The document states: *"This could include greater use of evening and weekend appointments, as well a greater choice in where tests might start."*

We believe that prior to the current industrial action that was happening. Tests are conducted in the evening and on Saturdays and Sundays, from fire stations, community centres, retail stores, to name a few.

**Tests might be offered from a wide range of venues. What factors should be considered in deciding on these?** This seems an odd question, the DfT/DVSA and its predecessors have been conducting driving tests for over eighty years and should know what is required. A minimum standard might be described as: appropriate routes; good road access to the test centre; a DDA compliant environment; a comfy waiting room; toilet facilities and a drinks vending machine.

The next question is also a little difficult to fathom. **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.**

A quick check on the *gov.uk* 'Driving test costs'<sup>1</sup> page shows that for evenings (4:30pm onwards, weekends and Bank Holidays) test candidates do pay more at the moment. For category B tests £13 more; and a quick check with the DVSA reveals that there is demand.

The document then considers ways that the driving test pass rate can be improved, while maintaining high standards. It states that there *"is anecdotal evidence that some learner*

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<sup>1</sup> <https://www.gov.uk/driving-test-cost>

*drivers are booking a practical test date well in advance – then taking the test at that time whether or not they are ready.”*

Being ready is a difficult judgement for a driver trainer and their client to make. Candidates do not wish to book a test when they are ready to take it. Candidates want to take a test when they are ready to take it which means the trainer and candidate have to predict at least six weeks and in the current climate perhaps sixteen weeks ahead when they believe the candidate will be ready to take their driving test.

Not only is this a struggle there is also the difficulty that trainers have in persuading a candidate to postpone their driving when that candidate might have to wait sixteen weeks for another date.

A short predictable waiting time is a great benefit in planning driving test appointments. Of course if government was serious about candidates not coming for test before they are ready they could require all tests to be booked by driver trainers and no candidate to be able to take a test without a certificate of readiness from a DVSA ADI.

The consultation then asks: **What could be done to ensure that candidates are better prepared for their practical test?** It goes on to state:

*“A fifth of all those killed and seriously injured on our roads are aged 17-24. A sizeable proportion of those passed their driving test fewer than six months before the collision. A review of international approaches to learning to drive showed that greater and more varied experience pre-test lowered the likelihood of a new driver being in an accident post-test.*

*“Around 1.5m tests are conducted each year; under a quarter (21%) result in a first time pass, the remainder are fails (53%) or people who pass on their second or subsequent attempt (26%). Encouraging learner drivers to take more practice before attempting their first test could reduce the total number of attempts taken to pass the driving test and lower the likelihood of their being in an accident post-test.”*

This statement seems to imply that the first time pass rate is 21% which is not true. The first time pass rate is actually 47.6%<sup>2</sup>. In round terms about half of candidates pass first time, about half of those who fail first time pass second time, about half of those who fail second time pass third time etc.

The document goes on to state *“We will explore whether a financial incentive to encourage people to take their test when they have a higher chance of passing, rather than having a go in hope of passing, would improve road safety and increase test pass rates. This could be*

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<sup>2</sup> Department for Transport statistics Table DRT0202. Practical car test pass rates by number of attempts, age and gender, Great Britain: 2014/15

*done through a reduced test fee, in the form of a deposit when the test is booked, refundable if the candidate passed.*

*“The proposal would not lead to a revenue increase to the DVSA as retained deposits would be used to fund a reduction in the basic practical test fee. Would a financial incentive encourage learners to sit the test when they have a better chance of passing? At what level should such an incentive be set?”*

**Would a financial incentive encourage learners to sit the test when they have a better chance of passing? At what level should such an incentive be set?**

There is little doubt that candidates who take plenty of lessons and are able to get plenty of practice do have a better chance of passing their test first time. There is evidence that to pass a test takes an average of more than 40 lessons, and 20 hours of private practice.

According to the DVSA<sup>3</sup>, The cost of learning to drive including test fees, forty hours of driving lessons and twenty hours of private practice totals £2,582. DfT seems keen to persuade more learners to take private practice however, according to the stated figures the average cost of insurance for a provisional driver aged seventeen to nineteen is £1,422.

According to an MSA GB survey<sup>4</sup> carried out a couple of years ago over seventy five per cent of instructors said that less than a quarter of their students took any private practice.

We doubt that a cashback figure could be charged that would be substantial enough to persuade learners not to want to “have a go” at the test if they think they are ready.

**What opportunities and risks do respondents see in alternative delivery models for the practical test? What factors are likely to attract potential partners to provide a service?**

Our principal concern about alternative delivery models centre on standards and particularly uniformity of standards which we believe are delivered in a fair and open manner by DVSA. We are concerned that a, for profit organisation, might not be able to maintain those standards.

**What are the most important actions we should take to streamline the LGV driver licensing process, while ensuring standards are maintained?**

A greater availability of funded apprenticeships, to encourage the younger driver into the industry with better pay rewards in their first year. Set training packages for the driver cpc,

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<sup>3</sup> DVSA Infographic

[https://www.safedrivingforlife.info/sites/default/files/The-cost-of-learning-to-drive\\_1.pdf](https://www.safedrivingforlife.info/sites/default/files/The-cost-of-learning-to-drive_1.pdf)

<sup>4</sup> MSA GB Questionnaire about pupils

<http://www.msagb.com/news/media/MSA%20Questionnaire%20about%20pupils%20-%20Spring%202013.pdf>

instead of each provider creating their own courses, if a more standard approach was met then a better standard across the industry could be achieved giving more confidence to insurers for the younger driver and firmer syllabus for the novice to follow.

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

There are many poorly geographic locations for test routes but that have a commercial haulage site where off road manoeuvres could be conducted in that area. During significantly large parts for a day, haulage firms have spare land where the off road element could be accommodated, their location is not always conducive for start and end of a test route but would benefit the industry with access more locally for the conducting of off road element, so customers/candidates do not have so far to travel to complete an off road section being separate to the on road practical tests, thus saving time, and allowing more time for the practical test which could then incorporate the driver cpc part 4 (practical examination) 30 minutes at the close of the test if that option is chosen. (giving a greater saving in time and cost to both the candidate and the DVSA).

**We would be interested to hear suggestions on how, and not only in relation to vocational drivers, the Drivers Medical service might resolve cases more quickly?**

Not having the full details of what the government is considering trialling it is difficult to see where the government is coming from on this issue, delays seem to be with the DVLA medical section who are slow to respond and frequently issue confusing and often conflicting letters of information to the drivers concerned, the use of too many generic letters not covering the specific medical issues as 'a wait and see' stop gap to the driver while they make further enquires or decisions. Greater guidance to the medical profession perhaps a number of GP, Ophthalmic opticians and other medical exponents trained to deliver a better examination between the DVLA medical group and the average GP would help sift any issues more quickly.

One of our members writes "I have just been dealing with a young autistic man who sent his licence off for renewal in February it was due to expire in late March, it took the Medical Assessment Group (MAG) until 10<sup>th</sup> September to renew his licence, even though there were no changes to his condition, during that time he was unable to take his theory test, even though he could continue to drive under section 88. The MAG seems to run at a very different time scale to everyone else."

**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?**

An increase in digital services is inevitable and has and will help to keep down the cost of driving tests. The reasonable alternative seems to be keeping telephone help available in a reasonably timely fashion. ADIs cannot afford to wait for half an hour to speak to an operator.

**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?**

The regulations prohibiting category B learner drivers from driving on motorways should be relaxed to allow them onto motorways with a qualified DVSA ADI.

It would appear that most people are convinced by this argument in July 2007 the House of Commons Transport Committee stated in its report into Novice Drivers<sup>5</sup> “We agree Learner drivers should be allowed onto high speed roads, and if necessary onto motorways — because in some places these are the only high speed roads to be found.”

On the 8 Nov 2011 Mike Penning MP then Parliamentary Under - Secretary of State at DfT stated in a debate in the House of Commons<sup>6</sup> that Learner drivers would be allowed on motorways. “I think we need to give people, particularly young people, the opportunity to learn how to drive on the motorway before they pass their test. That is why we will pass regulations to allow qualified driving instructors to take learners on to motorways.”

It should be noted that this is not just a matter of safety on motorways it also about educating all drivers that motorways are the safest and most economical roads to use in July 2015 the AA Charitable Trust<sup>7</sup> stated that “Almost half of motorists know friends or family who avoid driving on motorways with more than one in 10 women saying that they themselves avoid driving on motorways due to nerves. One quarter of drivers are even nervous when they know that family or friends are making a journey on a motorway. New figures show that one in 50 people, 13,000 per day, planning a route are driving extra miles by choosing routes that avoid motorways as they are too nervous to tackle the multilane roads”

## **IN CONCLUSION**

Members of MSA GB welcome this consultation as an opportunity to offer feedback, on these proposals and as a refreshing opportunity to have some input into policies and ideas before they are fully developed. We look forward to more detailed consultations on these subjects in the future.

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<sup>5</sup> House of Commons Transport Committee, Novice Drivers, Seventh Report of Session 2006–07.  
<http://www.publications.parliament.uk/pa/cm200607/cmselect/cmtran/355/355i.pdf>

<sup>6</sup> Hansard 8 Nov 2011 : Column 254

<http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111108/debtext/111108-0003.htm#11110882000032>

<sup>7</sup> The AA- Motorway Paranoia <https://www.theaa.com/newsroom/news-2015/aa-charity-offers-free-motorway-courses.html>