



Memorandum from:

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The Motor Schools Association of Great Britain (MSAGB) 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 (ADIs) we also represent a number of large goods vehicle driving instructors, some driving school proprietors, together with a number of bus/coach instructors and motorcycle instructors. All our members are users of the Government motoring agencies particularly in the area of driver testing which is now carried out by the, soon to be formally launched, Driver and Vehicle Standards Agency (DVSA).

### Summary

- a) Our evidence concentrates on the services provided by the DVSA. We believe that following the huge changes that have been forced upon this organisation over recent years the overall level of service they provide to driver and rider test candidates has continued to be of a high quality and that driving test booking and delivery has continued with a high degree of integrity, honesty and reliability.
- b) We do have a number of concerns around the DVSA interpretation of the governments digital by default policy as defined by the Cabinet Office: "By digital by default, we mean digital services that are so straightforward and convenient that all those who can use them will choose to do so whilst those who can't are not excluded."<sup>1</sup>
- c) It is the second part of this statement that DVSA are not complying with. They fail to give details of non-digital access routes to services and when challenged the organisation appears prickly and unwilling to help. This results in those who, for whatever reason, do not wish to engage with them digitally, being excluded from various processes.
- d) In addition we are concerned that the structure of the new agency does nothing to address the failings of past officials and their Ministers to address serious policy issues and institute much needed and long promised changes.
- e) A suitable epitaph for the Driving Standards Agency (DSA) might be "The home of broken promises, dashed dreams and wasted resources RIP." It is our hope that the DVSA might actually carry through some of the multitude of changes that have been promised and that could and should have been made in order to improve road safety in Great Britain.
- f) We are encouraged that part of the stated aim of the new agency is "We will improve road safety in Great Britain by setting standards for driving and motorcycling..."<sup>2</sup> This does sound laudable but without any structure to enforce these standards the new organisation appears somewhat impotent. Setting standards is not enough.

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<sup>1</sup>Policy paper "Government Digital Strategy" Updated 10 December 2013

<https://www.gov.uk/government/publications/government-digital-strategy/government-digital-strategy>

<sup>2</sup>Driver and Vehicle Standards Agency will soon be incorporated into

GOV.UK <https://www.gov.uk/government/organisations/driver-and-vehicle-standards-agency>

## The Committees questions regarding the user experience of Government motoring agencies.

1. Can these services be accessed when and where they are needed, including by people who do not use digital channels?
  - 1.1. With one major exception digitised services provided by the DVSA can be accessed reasonably easily. Whilst there have been some teething problems with digital delivery MSAGB and other stakeholders have worked with the agency to ensure that the provision meets the need and for the vast majority of time it does.
    - 1.1.1. The exception is the booking of check tests (soon to be re-named standards checks) for Approved Driving Instructors (ADIs). This service is still not digitised despite several years of discussion about the subject and is no longer fit for purpose. The current system of booking and particularly re-booking check tests is archaic and anachronistic and is in desperate need of updating. The current system wastes DVSA resources and those of ADIs. It also creates unnecessary stress for driver trainers attempting to rearrange their check tests. **DVSA should move quickly to provide an online booking service for ADI standards checks.**
  - 1.2. The DVSA however do not meet the needs of those customers who do not use digital channels. A large amount of stakeholder and customer interaction with the DVSA is initiated by the completion of a form. The agency has made it extremely difficult for these forms to be accessed in a paper format and are effectively marginalising those who do not have access to a computer or do not wish to interact digitally.
  - 1.3. Case studies (names changed to protect identities)
    - 1.3.1. Mike is 57 years old, an experienced and well established ADI in Liverpool. Many of his pupils come from challenging backgrounds and often do not have bank accounts of their own. Mike has had his bank cards cloned and misused in the past and does not want to use them online or register them with another body. He wants to book tests for his pupils by completing a paper form and sending in a cheque. The DVSA do not provide a link to download a form when he calls the agency they send him one form. **DVSA should provide internet access to all DVSA forms so that they can be printed by stakeholders/customers who do not wish to access services digitally.**
    - 1.3.2. Jane is an ADI based on the East coast near Bridlington. Jane is bringing up two children on her own and recently qualified as a driving instructor. She states that she can't afford a computer and admits to being something of a technophobe. Jane is anxious to improve herself as an ADI and wants to study the National Standard for Driver and Rider Training. Her local copy shop has refused to print the standard for her because they are concerned about copyright issues. **DVSA should provide copyright free access to all DVSA material so that they can be printed out for those who are unable to access items digitally.**
2. Are these services affordable and do they provide value for money?
  - 2.1. Affordable is a very subjective term. Certainly ADIs who provide the training services for learner drivers find it difficult to understand why driving test fees are so high. ADIs charge a fee which includes the provision of a dual controlled fully insured training vehicle with fuel at a price that is rarely much above £27.00 per hour and is often considerably less. The DSA charge out rate for practical car tests is around £65.00 per hour and of course they do not provide a vehicle.
3. Is personal or otherwise sensitive data handled appropriately?
  - 3.1. Yes we believe it is.
4. How has outsourcing of service delivery affected users?

- 4.1. As far as the driving theory test is concerned there have been few problems with this from a customer/stakeholder point of view.
5. When things go wrong, are problems dealt with quickly and fairly?
  - 5.1. Yes we have experience of dealing with the DSA four stage complaints procedure and have found that it works well and is robust.
6. How are users affected by the way in which Government agencies are structured to provide these services?
  - 6.1. The agency structure does not seem to work on the policy front. In the past the structure has meant that little has changed despite many promises made change never seems to happen.
  - 6.2. Examples
    - 6.2.1. **Compulsory Register of Driving Instructor Trainers.** A number of voluntary registers of car driver trainers are held and administered by the DVSA the oldest one which is a register of trainer trainers was launched in 1990 as ADITE, at launch driver trainers were told "Starting with a voluntary scheme will mean we can move to a compulsory scheme quite quickly." In 1998 it was decided to merge two trainer registers into one group called ORDIT. Speaking about the newly combined register the then DSA chief executive stated "Joining the two directories together will mean we are able to move towards a compulsory register much more quickly." In 2005 the then ADI Registrar speaking about the 2006 Road Safety Act said "Compulsory ORDIT is the first thing we want to do when the Road Safety Bill is passed." ORDIT remains a voluntary register despite many hours of talks, the use of a large amount of resources from both the agency and the trainers and an act of parliament which sets out a legislative framework for a statutory register.
    - 6.2.2. **Learner drivers allowed to be trained on motorways.** MSAGB has campaigned for learner drivers to be allowed on motorways in a dual controlled car with an ADI for many years. The consultation paper "A more Structured Approach (2001) suggested this should be introduced. A year later senior DSA officials were telling us "Learners on Motorways is going to be introduced, the announcement will be made in the next few days." In the Parliamentary session 2006-07. A previous Transport committee carried out an inquiry into "Novice Drivers" and a report of that inquiry the Transport Committees Seventh Report of that session was published in July 2007<sup>3</sup>. Paragraph 81 states "The Department is considering reforming the driving test as part of its review of the driver training framework. It told us, "Since we recognise that the syllabus needs to be broader, it follows that the testing process may also need to be changed substantially." **We agree that the driving test needs to be reformed. The driving instructors and examiners made a powerful case for allowing test candidates onto high speed roads, and if necessary onto motorways—because in some places these are the only high speed roads to be found. But such a measure should only be introduced along with a requirement for candidates to take the test in a dual-control vehicle.** In December 2011 Mike Penning MP, at that time a Transport Minister announced that he would initiate plans to allow learners on motorways if supervised by an ADI in a dual-controlled car. "My aim is for this change to be implemented next year following a full public consultation." said the Minister. Currently learner car drivers are not allowed to receive training on a motorway.
7. What are the pros and cons for users of changing the current structure?
  - 7.1. We can see no great advantages or disadvantages in enacting the change.
8. How are the needs of service users prioritised, particularly during periods of change?

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<sup>3</sup>Select Committee on Transport Seventh Report <http://www.publications.parliament.uk/pa/cm200607/cmselect/cmtran/355/35508.htm>

8.1. There has been no discernable reduction in service during the change.