



**Community
Transport
Association**

Response to the DSA

Consultation on Service Improvements, Safety Related Measures & General Fee Increases

Closing Date: 11 January 2007

The Community Transport Association

The CTA is a rapidly growing national charity giving voice and providing learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.

Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.

The CTA is the representative body for non-profit passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.

The CTA is the UK's largest provider of training, advice and information on accessible, voluntary and community transport provision. The CTA is funded by the Department for Transport, the Scottish Executive, the Welsh Assembly Government and the Department for Regional Development (Northern Ireland).

CTA's Response to Consultation

The CTA welcomes the opportunity to contribute to the DSA's consultation process. After reading through the consultation we are largely in favour of the proposals with a few notable exceptions.

Contact Details

Any queries regarding this response should be directed to:

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DSA CONSULTATION PROPOSALS 2006

Please Note: DSA is unable to consider any views submitted anonymously. Please complete your name and address below:

Reply Form:

Name: Brian Shawdale Title: Mr ~~Mrs/Miss/Ms.~~

ADI Number (if applicable).....

Organisation (if applicable)*...Community Transport Association

* Please see below

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* Organisation Details:						
Organisation purpose: please tick the relevant box:						
ADI	M/c trainer	LGV/PCV trainer	Driver/rider trainer representative organisation	Government Department/Local Authority RSO	Police/Fire MoD etc.	Others: * please specify below
						<input checked="" type="checkbox"/>
<p>*Others: Charity</p> <p>Organisation aims: The CTA is a rapidly growing national charity giving voice and providing learning and enterprise support to member organisations, which are delivering innovative transport solutions to achieve social change. CTA UK promotes excellence through providing training, publications, advice and information on voluntary, accessible and community transport.</p> <p>Voluntary and community transport exists to meet the travel and social needs of people to whom these would otherwise be denied, providing accessible and affordable transport to achieve social inclusion.</p> <p>The CTA is the representative body for non-profit passenger transport operators in the UK. CTA Member organisations are involved in the provision of transport, especially accessible services.</p> <p>Number of views represented by this response: The Association has 1340 members.</p>						
How were the views gathered: The CTA operates a UK wide Advice Service						

Please tell us what you think of each proposal by ticking **one** of the boxes below each proposal. If you wish to comment on the proposal, please do so in the space provided.
Please note that we will only take account of any comments if you have ticked the relevant box immediately below each proposal.

If you need more space for your comments, please continue on a separate sheet. Clearly cross-reference your comments to the relevant proposal and securely attach the sheet to the remainder of your response.

Proposal 1: Investigate allowing road freight companies to undertake lorry driving tests for their staff.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
	X			

The practice works well for bus companies with delegated authority to conduct PCV tests and so it should be available for larger freight companies.

Proposal 2: Reduce the minimum wait following unsuccessful practical tests for cars and vans towing trailers.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
	X			

It will be good to standardize the waiting days across the industry.

Proposal 3: Introduce fairer cost recovery arrangements for ‘in house’ theory tests.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

Any extra cost incurred in the provision of ‘in-house’ theory tests should be bourn by the organization authorized to undertake such tests.

Proposal 4: Conduct criminal history checks for ADIs and recover associated costs via the fee for the theory test taken as part of the ADI qualification process.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

ADI’s with CRB checks will reassure candidates of their personal safety whilst undertaking training.

Comments on longer-term arrangements to recover the costs of undertaking regular CRB checks

Self employed ADI’s may object to the additional cost whilst companies employing ADI’s could bear the cost however the long-term benefit to the candidates safety should outweigh the objections. It may also remove a perceived barrier to vulnerable people learning to drive.

Proposal 5: increase in stages the number of questions in the theory tests taken by learner lorry and bus drivers.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

Increase in the number of questions asked will prove the candidates knowledge of the subject in depth and improve road safety.

Proposal 6: Introduce an additional ten minutes driving time to bus, coach and lorry tests from September 2008.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

Proposal 7: Restrict the use of panel vans and soft-top convertibles as types of vehicles which may be used for practical car driving tests as per option 4 of Annex A2 (i.e. early amendment of legislation requiring an adequate field of vision)

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

It will be easier for examiners to make accurate assessments of the candidates ability to drive and will also increase their safety.

Proposal 8: Increase the price of *The Highway Code* and promote its use amongst the general public.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
				X

We believe that The Highway Code should be free to gain readership and circulation. It should be made available to candidates on application of their provisional licence.

Proposal 9: Increase the number of questions in the theory tests taken by car drivers motorcycle riders.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

Increase in the number of questions asked will prove the candidates knowledge of the subject in depth and improve road safety.

Proposal 10: Introduce quality assurance arrangements for Approved Training Centres and courses for Periodic Training for professional drivers of buses, coaches and lorries

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
	X			

Quality assurance arrangements for Approved Training Centres will increase candidate and peer confidence of the service provided. The DSA needs to define an Approved Training Centre as an organisational centre with specific staff controlling and monitoring the training delivery. Such quality assured training must be able to be delivered at a number of different locations. Periodic training for professional drivers of buses, coaches and lorries, via Driver CPC training, will increase public safety.

Proposal 11 (i): Recording CPC status using Driver Qualification Cards

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
			X	

We think that the CPC should be shown on a driver's license by way of a code as opposed to issuing a second Driver Qualification Card as UK drivers will have all their information on one card and it would mean periodic confirmation that all the details are correct ie address details.

Proposal 11 (ii): Recovering costs of issuing DQCs with a £25 fee

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
			X	

Along with the extra cost of training to gain a Driver CPC the charge for a DQC may deter drivers taking the CPC training. A much-heralded Government policy removed the fee for vocational licence several years ago. Introducing any fee for vocational licence is a retrograde step.

Proposal: 12 Improve the initial training for delegated examiners authorised to conduct practical driving tests for learner bus and coach drivers.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

Higher standards of training for delegated examiners will only improve the standards of drivers of bus and coach drivers.

Proposal 13: Introduce a requirement for a driving test candidate to surrender, in certain circumstances, a driving licence to the theory test invigilator or practical test examiner.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

If an invigilator or examiner suspects a candidate is not the licence holder then we agree the licence should be surrendered.

Proposal 14: Increase the fees for the practical motorcycle/moped test.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Proposal 15: Increase the fees for the practical tests taken as part of the ADI qualification process.

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Proposal 16: Increase the charges for in the non-statutory instructor registration schemes operated by DSA

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Proposal 17: Increase the charges for Taxi and Private Hire car tests

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Proposal 18: Increase the charges for Pass Plus products

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Regulatory Impact Assessments (RIA) – Do you consider that the estimated costs and

savings identified in the initial RIAs at Annex A1 and A2 are accurate?

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Equality Impact Assessment (EIA) –The EIA has correctly considered the likely effect of the proposals on specific groups?

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
		X		

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Do you feel that this Consultation Paper meets the consultation criteria at Annex D?

In favour	Partly in favour	Neither in favour nor against	Partly opposed	Opposed
X				

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