



**Community
Transport
Association**

Response to the Motoring Services Strategy Consultation

Closing Date: 8/01/2016

The Community Transport Association

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The Community Transport Association is the national body working with the providers of community transport helping them to remain relevant and responsive to key areas of public policy and make a big difference for people and families in the communities they work in. These are typically charities and voluntary groups rooted in their own local community.

The CTA is the UK's leading authority on the practice and performance of the UK's CT sector and uses its research to gather insights and intelligence from local communities to inform the development of public policy.

We are for, and about, accessible and inclusive transport.

We work with people who all want the very best for their communities and see accessible and inclusive transport as part of the answer to the big questions about how we are all to live, learn, work, participate and belong.

We work for a better world where individuals are able to design their own ground-up transport solutions, placing accessibility and inclusivity centre-stage in a way that nobody else ever has.

Community transport

In all parts of the UK, on every day of the year - including Christmas Day – thousands of community transport staff and volunteers are helping people to stay independent, participate in their communities and to access vital services and employment.

Community transport is about providing flexible and accessible community-led solutions in response to unmet local transport needs, and often represents the only means of transport for many vulnerable and isolated people. Significant user groups are older people and disabled people.

Using everything from mopeds to minibuses, typical services include voluntary car schemes, community bus services, school transport, hospital transport, dial-a-ride, wheels to work and group hire services. Most services are demand-responsive, taking people from door to door, but a growing number are offering scheduled services along fixed routes where conventional bus services are not available, especially in rural areas.

As community transport works to a different business model to commercial passenger transport services - i.e. it is always run for a social purpose and community benefit, but never for a profit - it often a more reliable and resilient way of ensuring a broader range of transport needs can be met.

Whilst the journeys community transport delivers account for a small proportion of the total passenger journeys made every year by the public, their significance in improving the lives of the people who use these services is remarkable.

CTA's Response to the consultation

This winter the government launched a Motoring Services Strategy Consultation. The wide ranging document looks at a number of facets of motoring strategy. The consultation is about setting the strategic direction that the Department of Transport's three motoring services agencies (DVLA, VCA and DVSA) should take over the life of this Parliament.

At the Community Transport Association we believe this consultation represents a key opportunity to feed into the government's strategy on a topic which is integral to the good running of community transport operations. The CTA's number one priority is to make sure that community transport services are run safely and legally, which it supports through its advice, information and training services. This document has been produced during a key phase of the current Parliament, occurring contemporaneously with the announcement of overall budget cuts of 37% to the Department for Transport, and a pledge of increasing infrastructure investment by 50%. In an era of multi-modal integrated transport policy decisions made now will have a profound effect right across the road network.

We believe that the needs of community transport operators, and users, should be integral in devising a new Motoring Services Strategy. In putting together this response we have collated what we believe are some of the key issues relating to community transport users. Our response is based on considerations from external research as well as our own research and expertise.

Our response makes particular reference to developments around driving tests, vehicle regulations, and how we believe suggestions in the consultation could impact our members.

Driving Tests

1. There are several different approaches to driving tests throughout the world. Finland for example have notoriously stringent conditions for achieving a driving license that include driving on a slippery road, and they have a much longer theory test than in the UK.
2. At the Community Transport Association we believe that a challenge for the future is recruiting sufficient number of young drivers to support community transport operators. This has to be counterbalanced with the fact that community transport operators are frequently responsible for the transportation of children, elderly people, and vulnerable adults. We believe that enhancing the quality of the driving test could have positive benefits in making roads safer. Additionally, we know from research that the number of young people overall taking driving tests is declining, a trend in years to come that will have a negative impact on volunteer recruitment for community transport operators. We would like to see a system in place that not only encourages more young drivers, but a driving test that encourages the development of further skills. Introducing additional practice around awareness of carrying passengers, driving in a variety of weather conditions, and night time driving are all feasible steps that could improve road safety.
3. One of the major ways we believe that driving tests could be improved is through better use of learning technologies. Digital media in the form of videos on driver licence checking has already been rolled out and we believe that it is necessary to make greater use of digital media in informing learner drivers of the competencies expected of them. Given the proliferation of smart devices this represents an opportunity to reach a broad audience with information on the competencies that are being assessed in driving tests. This would also provide learner drivers to learn about the nature of driving tests at an earlier stage than driving lessons.
4. We believe that in looking at a range of venues for driving tests the Department for Transport needs to be sure that all venues offer an equitable experience for learner drivers. For the practical test to be fair test routes should as far as possible present similar driving conditions, and test driving competencies in an equitable manner. The expansion of driving test venues could benefit many learners who live in isolated and rural communities, and as such we would welcome this development.
5. Pass rates for first time drivers remain relatively low. In addition research carried out by LV=Car Insurance, found that drivers who pass their test first time are the group most likely to be involved in accidents. Given the relatively high cost of lessons in comparison to a test it will be difficult to make a financial discount on testing proportionate to the cost required for learners to undertake additional lessons. Enforcing a minimum amount of hours a learner must undertake with an Approved Driving Instructor is one possible solution to increasing the number of drivers who pass first time. Reinforcing the importance of safe driving through theory assessment and driving lessons could be one solution in training safer drivers.
6. Furthermore, we believe that more can be done to ensure drivers are prepared for driving in adverse weather conditions. New drivers should be better encouraged to undertake additional lessons through schemes such as Pass Plus. In addition drivers who

demonstrate continued learning should be offered a greater discount on their vehicle insurance.

7. As a barrier for many new drivers is the cost of purchasing a car we believe the government should provide additional funding for car clubs, and volunteer car schemes. In providing volunteer car schemes with additional funding for vehicle purchase, maintenance, and insurance, volunteer car schemes will be better able to serve the needs of their community and provide new drivers with a way of accessing a car while gaining voluntary experience.
8. As well as exploring commercial partnerships it is possible that larger voluntary organisations (including community transport operators) may be potential partners to practical driving tests. Voluntary organisations already provide driver training to PCV drivers. It would be beneficial for the Department for Transport to explore how voluntary organisations that are already providing forms of driver training could work as potential partners in providing a practical driving test service.
9. More broadly we believe that there should be further consideration made for the provision of funding for volunteer drivers from community transport schemes to obtain their PCV D1 license. This would benefit the community transport sector by encouraging more PCV drivers which in turn would benefit the communities who use community transport services.

Vehicle Regulation

10. We believe that legal regulation should be proportionate to the size of the organisation. Given the associated costs of some regulation, balanced against the function of maintaining standards, we believe that a targeted rather than a blanket approach to road regulation will achieve the best results for road users.
11. At Community Transport Association we are aware that delays at the Drivers Medical Service is having an effect on our membership. These delays have a particularly negative impact on drivers who reach 70 years old and have to meet the higher medical standards of the PCV medical in order to retain their D1 101. We believe that better use of digital technologies to enable better record sharing between the Drivers Medical Services and other clinicians could enable quicker decisions on fitness to drive to be made.
12. We believe that having a review of MOT tests is worthwhile, especially given that the ways in which MOTs are carried out has not been reviewed for a number of years. In order to be assured that this will have no impact on the safety of road vehicles we believe it is important that any considerations on MOT review are informed by evidence that illustrates there will be no impact on road safety if MOTs are made less regular.
13. We believe that transport operators can be kept abreast of developments in agencies through the better collection of data, including email addresses. In forming closer links with representative bodies such as the CTA agencies can better disseminate information to a larger group of road users.

Efficiency and Deregulation

14. The CTA has a reputation for being one of the most robust and diligent designated bodies for issuing Section 19 permits. It has a strong track record of monitoring permit usage and investigating potential misuse of them.

15. At CTA we believe that efficiency is brought about by ensuring regulation is proportionate to vehicle operators and can be consistently interpreted. The CTA understands from members that there is ambiguity regarding mandatory and advisory maintenance requirements for S19 and S22 operated vehicles. The CTA believes that in order to maintain standards and reduce risk the application process for S19/S22 permits should be expanded to include submission of a planned maintenance programme as another criterion for issue. In order to ensure compliance and consistency the CTA also believes that the number of agencies designated to issue S19/S22 permits should be restricted to DVSA and the CTA.

Other Issues

16. In general the move toward a more digital service could bring efficiencies that we would hope would benefit road users. In spite of this, we would recommend that the DfT remain mindful that many drivers may not have access to digital facilities, and that these drivers should not be penalised for this.

17. The use of smartphone and tablet applications for drivers and owners has been talked about at length in the Community Transport Sector, and with partners such as Novacraft at our recent Westminster Conference. As the DfT are also considering looking at application programming interfaces for fleet management, we believe there is a space to look at management applications for other transport groups, including community transport providers.