



Mr. Andrew Charlesworth-May  
Department for Transport  
Motoring Services  
Zone 2/29  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

6 February 2015

Dear Mr. Charlesworth-May,

**RE: Consultation on DVSA Fleet Compliance Measure**

The BVRLA welcomes the opportunity to contribute to the consultation on the DVSA's proposed business plan. Having participated in the DVSA's engagement seminars to help shape its next generation enforcement programme, we note and endorse its commitment to developing a fleet compliance outcome measure that will facilitate better understanding of its activities.

The BVRLA believes that the three potential outcome measures, as set out in the consultation document, would be useful means of In terms of each proposed measure, we would also make the following comments:

Potential measure 1: Vehicle Roadworthiness Compliance of HGVs and PSVs

The BVRLA notes the Fleet Compliance Check survey, which estimates that 10.2% of all miles travelled by British HGVs are travelled by a vehicle which would face a prohibition if stopped. We support the importance of vehicle testing, and DVSA's objective of achieving 100% compliancy for all vehicles.

However, we should point out that HGV and PSV vehicles are already subject to one of the most vigorous testing systems in Europe. With randomised roadside testing, this subjects the (compliant) vehicle operator with additional burdens which can be time-consuming, costly (in terms of both time and expense), and frustrating. For this reason, we propose that known or suspected offenders should be targeted for testing, as opposed to open random checks. For example, the DVSA have previously proposed an "earned recognition" scheme, which operators of commercial vehicles could opt in to demonstrate the compliancy of their HGV and PSV vehicles. We propose that operators who can consistently demonstrate compliance through membership of such a scheme should face reduced roadside testing, and therefore provide an incentive for the remainder of the industry to improve their own vehicle standards.

**British Vehicle Rental and Leasing Association**

River Lodge, Badminton Court, Amersham, Bucks HP7 0DD

tel: 01494 434747 fax: 01494 434499 e-mail: [info@bvrla.co.uk](mailto:info@bvrla.co.uk) web: [www.bvrla.co.uk](http://www.bvrla.co.uk)

---

Honorary Life President: Freddie Aldous Chairman: Peter Cakebread Chief Executive: Gerry Keaney

A company limited by guarantee Registered Office as above Registered in England No. 924401

As part of the DVSA's proposed earned recognition scheme, we would also recommend that consideration is made toward operators who are already compliant with existing standards and codes of excellence. For example, BVRLA members are already signatories to a mandatory code of conduct, which has recently been updated and upgraded to be even more prescriptive in certain areas. For example, the Commercial Vehicle Code of Conduct now requires even higher standards for vehicle maintenance, safety in packing and loading, and the checking of operator licences for LGV drivers.

By DVSA recognising this and similar industry-based codes and providing a light-touch regulatory approach for operators with a demonstrable track record of compliancy, this will allow DVSA to concentrate enforcement on those operators who vehicles do not necessarily reach the same mandatory standards. This targeted approach will not only help DVSA to increase standards across industry, but also realise further efficiency savings.

#### Potential measure 2: Driver Compliance Measure for HGVs and PSVs

Again, the BVRLA support targeting drivers who are known or suspected of being non-compliant, over a randomised roadside testing approach.

#### Potential measure 3: MOT test quality

While the BVRLA supports the proposal to improve the MOT test quality, we believe that testing of Commercial Vehicles requires modernisation in order to focus on areas which can reduce road accidents and casualties. Currently MOT testing of CVs does not test on areas which will necessarily impact on accidents or road deaths, the KSI ("killed or seriously injured") criteria. For example, a vehicle can currently fail an MOT due to a faulty light bulb over the number plate – yet vehicles can now easily be tracked using roadside cameras and other technologies, so this is arguably a futile test. Testing should therefore focus on areas which are likely to reduce road accidents and casualties and should be modernised to incorporate the new and emerging vehicle safety technology.

There are also options to be considered in improving the rates of Commercial Vehicles being tested for a new MOT, and a role for central government to play a role in addressing road safety through vehicle maintenance. For example, while the DVLA currently send a written reminder to drivers in the month of car tax becoming due, no reminder is sent regarding the upcoming renewal date of an MOT. Modern technology allows for this to be carried out easily, inexpensively and automatically – for example, through an automated text or email being sent on behalf of the DVSA to the registered driver.

#### Other comments

The BVRLA would welcome the prospect of greater collaboration between the DVSA and other motoring agencies. With much of the work of the DVSA and DVLA overlapping (on issues such as providing guidance around road and vehicle safety, setting standards for the reduction of greenhouse gases and other emissions etc.), providing a single point of access (e.g. a web portal) detailing the above information could provide several efficiency benefits including greater clarity for drivers and/or vehicle owners in all aspects of road and vehicle use; a more streamlined approach when considering and implementing policy and standard setting; and further reductions in running costs and efficiency reforms.

There is also an urgency on the DVSA (and other agencies) to significantly widen the services which can be provided electronically. Observing for example the DVLA's move away from paper-based identifications and certifications to an e-based service, this has been calculated to achieve greater efficiency, ease of use for the customer, and a significant element in the DVLA's planned £100 million reduction in annual running costs. For the fleet sector alone, conversion to electronic interactions with DVLA will also help secure and estimated cost savings to business in excess of £30 million each year. These savings will help to underpin the Government's wider agenda of supporting growth and jobs in the UK, and we urge the DVSA to follow the example of its motoring agency counterpart and take the digital approach.

We welcome the opportunity to contribute to this inquiry, and will be happy to provide further evidence if requested.

Yours faithfully,



**Jay Parmar**  
Director of Policy & Membership

#### **Bona-fides: The BVRLA, the industry and its members**

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 3.3 million cars, vans and trucks.
- BVRLA members buy nearly 44% of all new vehicles sold in the UK, supporting around 184,000 jobs and contributing more than £14bn to the economy each year.
- Through its members and their customers, the BVRLA represents the interests of more than two million business car drivers and 10 million people who use a rental vehicle each year.
- As well as informing the Government and policy makers on issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct, helping its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, visit [www.bvrla.co.uk](http://www.bvrla.co.uk)