# Heavy vehicle testing review: call for evidence.

**Introduction**

Thank you for responding. Your views will help to garner the attitudes towards our suggested options to improve heavy vehicle testing.

Closing date is 9 June 2023.

### View all the questions.

This survey provides questions based on user choice, a [full copy of the questions is available [opens in a new window]](https://www.gov.uk/government/consultations/heavy-vehicle-testing-review-call-for-evidence/heavy-vehicle-testing-review-call-for-evidence#consultation-questions).

### Print or save a copy of your response.

At the end of this questionnaire, you may either print or save a copy of your response for your records. This appears after pressing 'Submit your response'.

### Save and continue option.

You may 'save and continue' at any time. If you do you will be sent a link via email to allow you to continue your response where you left off.

You must enter your correct email address if you save and continue, a mistake in the email address means you won't get the link you need.

### Accessibility statement

Read our [accessibility statement for Smart Survey forms (opens in a new window)](https://www.gov.uk/government/publications/dft-accessible-online-form-and-survey-statement/accessibility-statement-smartsurvey-forms).

### Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation on attitudes towards our suggested options to improve heavy vehicle testing. [Our DfT online form and survey privacy notice [opens in a new window]](https://www.gov.uk/government/publications/dft-online-form-and-survey-privacy-notice/dft-online-form-and-survey-privacy-notice) gives more information on how your personal data is processed in relation to this survey.

In addition to the information outlined in the privacy notice we are asking from:

|  |
| --- |
| * individuals their relationship to vehicle maintenance
 |
| * organisations the type they are and if an Earned Recognition (ER) operator:

|  |
| --- |
| - how they carry out maintenance- if they have an Authorised Test Facility |
|  |

 |

**Your details**

### 1. Your (used for contact purposes only):

|  |  |  |
| --- | --- | --- |
| name?    |

|  |
| --- |
|  John Taylor |

 |
| email address?    |

|  |
| --- |
|  John.taylor@cpt-uk.org |

 |

### 2. Are you: ****\*****

|  |  |
| --- | --- |
|    | answering as an individual? |
|    | providing an official response on behalf of an organisation? (Go to ‘Organisation details’) |
|  |  |

**Individual details**

### 3. You are:

|  |  |
| --- | --- |
|    | an individual that maintains vehicles? |
|    | a motorist? |
|    | another type of user?

|  |
| --- |
|   |

 |

[After answering go to ‘Proposals’]

**Organisation details**

### 4. You are best described as:

|  |  |
| --- | --- |
|    | an Earned Recognition (ER) vehicle operator? |
|    | a non-ER vehicle operator or leaser? (Go to ‘Proposals’) |
|    | a vehicle manufacturer or dealership? (Go to ‘Proposals’) |
|    | an organisation that maintains vehicles. (Go to ‘Proposals’) |
|    | an organisation that provides vehicle testing (authorised test facilities)? (Go to ‘Proposals’) |
|    | a trade body representing those in the public service vehicle or heavy goods vehicle sector? (Go to ‘Proposals’) |
|    | a road safety organisation? (Go to ‘Proposals’) |
|    | another type of organisation? (After answering go to ‘Proposals’)

|  |
| --- |
|   |

 |

**Earned Recognition operator.**

### 5. You:

|  |  |
| --- | --- |
|    | carry out your own maintenance? |
|    | use a third-party maintenance provider? |
|    | both carry out your own maintenance and use a third-party maintenance provider? |

### 6. Do you have your own Authorised Test Facility (ATF) for maintenance?

|  |  |
| --- | --- |
|    | Yes |
|    | No |
|    | Don't know |

### 7. In your view is the Earned Recognition scheme a fair system?

|  |  |
| --- | --- |
|    | Yes (Go to ‘Proposals’) |
|    | No |
|    | Don't know (Go to ‘Proposals’) |

**Increasing fairness**

### 8. How, in your view, can the Earned Recognition scheme be improved to ensure that it is a fair system?

|  |
| --- |
|   |

**Proposals**

We are consulting on making potential improvements to heavy vehicle testing by altering the [earned recognition (ER) scheme [opens in a new window]](https://www.gov.uk/guidance/dvsa-earned-recognition-join-the-scheme).
We have suggested 4 ways this scheme could be altered and are seeking your views on these options offered as well as any alternative approaches you may prefer to see implemented.

The options given for ER operators are:

|  |
| --- |
| * option 1, to increase the time between tests
 |
| * option 2, delegated testing
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision
 |

### To increase the time between tests

This would remove the requirement for ER operators to have their vehicles and trailers tested at the current 12 monthly intervals, extending the period to provide more flexibility. Initial consideration is that every other year (two yearly) would be an appropriate frequency. This option would require primary legislation and it could take considerable time to implement.

### Delegated testing

This would involve allowing ER operators to test their own vehicles and trailers, by default retaining existing frequency (annual from year 1). There is consideration as to the extent to which those conducting the test would need to be able to demonstrate independence from those that are maintaining or repairing the vehicle.

### Reduced test content

This would involve reducing the content of the annual test for ER operators’ vehicles, such as by removing some items that are covered in routine inspections or, in the longer term, which can be shown to be effectively monitored by in-vehicle systems. However, the vehicle would still be required to be presented for assessment against the aspects that remain within the annual roadworthiness inspection, and existing in-use requirements for vehicle condition would remain across the whole range of items. This would require some legislative change, which would impact on implementation timescales.

Options 1 to 3 all propose significant change to the statutory basis of vehicle testing, aimed at reducing the burden on ER operators.

### Improved service provision

Option 4 proposes that DVSA could focus its service improvement efforts on those operators to minimise the testing burden which would not require legislative changes. Such an initiative could, for example, include:

|  |
| --- |
| * complete or greater guarantee of requested Authorised Testing Facility (ATF) slots for ER operators (and potentially those providers nominated by them)
 |
| * full move away from tracking tester utilisation, offset by different fee arrangements
 |
| * full flexibility around days or hours worked to match maintenance requirements so ER operators can get a test most suited to business needs
 |

Further [information and evidence is supplied in the consultation documentation [opens in a new window]](https://www.gov.uk/government/consultations/heavy-vehicle-testing-review-call-for-evidence/heavy-vehicle-testing-review-call-for-evidence).

### 9. Do you believe that the existing testing regime for ER operators should be altered?

|  |  |
| --- | --- |
|    | Agree (Go to ‘Reason for changes’)  |
| [ ]    | Disagree |
|    | Don't know (Go to ‘Continue’) |

**Disagree with change.**

### 10. Why not?

|  |
| --- |
|   |

[After answering go to ‘Continue’]

**Reason for changes**

**11. Why?**

|  |
| --- |
|  The scheme is targeted at the top operators and as such there is prestige in being an earned recognition operator. But apart from being recognised as an exemplary and DVSA-accredited operator, there is very little practical benefit for the ER operator, perhaps even more so for a PSV operator. Operators are questioning why they should be members or stay as members, so it is important to offer additional practical benefits and reward the efforts that ER operators put into ensuring high standards and participating in the scheme. |

[After answering go to ‘Option 1: increase the time between tests for Earned Recognition’]

**Continue**

### 12. As you disagree or are unsure about our options for changes to heavy vehicle testing and the remainder of this survey is about the considerations for potential implementation, you may now either: ****\*****

|  |  |
| --- | --- |
|    | go to the final comments section? (Go to ‘Final comments’) |
|    | continue answering the questions? |

**Option 1: increase the time between tests for Earned Recognition**

### To increase the time between tests

This would remove the requirement for ER operators to have their vehicles and trailers tested at the current 12 monthly intervals, extending the period to provide more flexibility. Initial consideration is that every other year (two yearly) would be an appropriate frequency.

### 13. What:

|  |  |  |
| --- | --- | --- |
| advantages do you believe increasing the time between tests for ER would bring to an operator?    |

|  |
| --- |
|  It would save some time for the operator having to book and take vehicles to test stations. It would reduce one test fee and the mileage to and from the ATF |

 |
| disadvantages do you believe increasing the time between tests for ER would bring to an operator?    |

|  |
| --- |
|  The perception that vehicle safety is being compromised as vehicle tests move from annual to bi-annual  |

 |

### 14. What impact do you think increasing the time between tests would have to:

|  |  |  |
| --- | --- | --- |
| Authorised testing facility services (ATFs)?    |

|  |
| --- |
|  The number of tests would reduce by half for the ER operators so less revenue for the ATFs, but this would only affect the ER operators so about 15% of all vehicles on the road and many ER operators run their own ATFs anyway. |

 |
| non-ER operators?    |

|  |
| --- |
|  It might result in reduced ATFs so non-ER operators might have trouble finding testing availability locally. However, it is more likely to result in better test availability for these operators as slots previously used by ER operators are freed up. |

 |
| other areas?    |

|  |
| --- |
|   |

 |

### 15. Do you believe there are risks to road safety if the increasing the time between tests option is implemented?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option 1: increase the time between tests for Earned Recognition’) |
|    | Don't know (Go to ‘Option 1: increase the time between tests for Earned Recognition’) |

**Increasing the time between tests: road safety risks**

### 16. What risks and how could these be mitigated?

|  |
| --- |
|  The risk would be that if this proposal was rolled out to all operators the unscrupulous operator would not maintain their vehicles to the same standard and the standards of vehicles on the highway might worsen.However, in reality, passing the annual test is almost a given for many ER operators and indeed others that place a high emphasis on safety but who have to date chosen not to participate in the scheme. Regular inspections and good driver walkaround regimes are more fundamental to operators’ maintenance regimes than the annual test. |

**Option 1: increase the time between tests for Earned Recognition operators.**

### 17. What are the practical considerations when increasing the time between tests for:

|  |  |  |
| --- | --- | --- |
| vehicles changing operators?    |

|  |
| --- |
|  If the ER operator sells a vehicle after 13 months to a non-ER operator the vehicle would require an immediate annual test |

 |
| correct recognition of vehicles and trailers?    |

|  |
| --- |
|   |

 |
| transitionary measures?    |

|  |
| --- |
|  Some ER operators may choose to continue with an annual DVSA test. Understanding which may do this and which would immediately take advantage of the increased flexibility would be important for DVSA and ATF resource planning. |

 |
| other areas not covered?    |

|  |
| --- |
|   |

 |

### 18. You believe tests should be:

|  |  |
| --- | --- |
|    | retained at every year? |
|    | implemented every 1 to 2 years? |
|    | implemented for another regular period above 2 years?

|  |
| --- |
|   |

 |

### 19. What, if anything, would you like to change in option 1 which increases the time between tests for ER operators?

|  |
| --- |
|   |

**Option 2: delegated testing for ER operators**

### Delegated testing

We are proposing that this option would retain the existing year frequency testing requirement. There is consideration as to the extent to which those conducting the tests would need to be able to demonstrate independence from those that are maintaining or repairing the vehicle, and how this would be archived.

### 20. In your view should ER operators be able to sub-delegate testing to their own maintenance providers?

|  |  |
| --- | --- |
|    | Yes |
|    | No |
|    | Don't know (Go to ‘Option 2: delegated testing for ER operators’) |

**Sub-delegation**

### 21. Why?

|  |
| --- |
|  |

### 22. How, in your view, should ER operators demonstrate independence of testing from vehicle maintenance and operation?

|  |
| --- |
|   |

**Option 2: delegated testing for ER operators**

### 23. What:

|  |  |  |
| --- | --- | --- |
| advantages do you believe delegated testing would bring to an operator?    |

|  |
| --- |
|   It would improve flexibility for the earned recognition operator. The testing cycle would stay annually. The operator can manage its testing and have the ability to test at a time and date that would suit its operation. It would have its own staff could prepare the vehicle for test, but the actual test would need to be undertaken by another employee who had been trained and certificated to be a vehicle MOT tester.It would save some time for the operator having to book and take vehicles to test stations. It would save test fees and the mileage to and from the ATF. |

 |
| disadvantages do you believe delegated testing would bring to an operator?    |

|  |
| --- |
|  It would mean the loss on an annual independent assessment of vehicle maintenance standards |

 |

### 24. What impact do you think delegated testing would have to:

|  |  |  |
| --- | --- | --- |
| ATFs?    |

|  |
| --- |
|   Initially the testing should be carried out by operators who have their own test facility, so I don't foresee an impact on other ATFs |

 |
| non-ER operators?    |

|  |
| --- |
|  A positive impact as it improves the availability of test slots at other testing stations |

 |
| other areas?    |

|  |
| --- |
|   |

 |

### 25. Do you believe there are risks to road safety if delegated testing is implemented?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option 2: delegated testing for ER operators’) |
|    | Don't know (Go to ‘Option 2: delegated testing for ER operators’) |

**Delegated testing: road safety risks**

### 26. What risks and how could these be mitigated?

|  |
| --- |
| The risk would be that if this proposal was rolled out to all operators the unscrupulous operator would not maintain their vehicles to the same standard and the standards of vehicles on the highway might worsen.  |

**Option 2: delegated testing for ER operators**

### 27. What are the practical considerations when delegating testing for:

|  |  |  |
| --- | --- | --- |
| approvals required for a person to be deemed as competent for testing vehicles.    |

|  |
| --- |
|  All testers would need to attend a course offered by DVSA and pass an examination (MOT Demonstration Test) at the end of this in order to qualify as a Class 6 Tester. DVSA would offer the course and examination in a range of locations according to demand. It is proposed that only fully qualified engineers would be eligible to become vehicle testers. This would offer a higher level of quality assurance.a Tester could only test at ATFs belonging to their employer or another company within the group. This would provide additional assurance by linking the tester with the facility and provider.Testers should not take any part in the preparation of a vehicle for test but would be permitted to undertake other maintenance functions within the organisation. |

 |
| transitionary measures?    |

|  |
| --- |
|   The operator you could only start testing once their annual test staff have passed the appropriate DVSA course |

 |
| other practical considerations not covered?    |

|  |
| --- |
|  Would need to consider the systems used for conducting and recording the test, i.e., access for the delegated tester to a version of the DVSA system. |

 |

### 28. Do you believe there will be challenges finding the additional tester capacity within the industry necessary to implement our delegated testing proposal?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option 2: delegated testing for ER operators’) |
|    | Don't know (Go to ‘Option 2: delegated testing for ER operators’) |

**Delegated testing: additional tester capacity challenges**

### 29. What challenges and what do you think the will be the impact of these?

|  |
| --- |
|   If earned recognition operators on testing their vehicles, they would ensure that they employ sufficient testers. There would be approximately 15% reduction in the number of tests required that the DVSA would have to carry out. The DVSA have consistently failed to meet their staff headcount and currently have a churn of 15% a year. The number of staff the DVSA employ should stay the same so that they can fulfilled 2 roles firstly to test the other 90% of the fleet and the second role would be to randomly inspect earned recognition operator test standards plus supply annual test training for earned recognition operators. Taking account of the ER fleet as a 15% of the overall total and the fact that some operators may choose to continue using DVSA for assurance purposes - but also more might join ER because there'd now be a practical advantage of being in the scheme! |

**Option 2: delegated testing for ER operators**

### 30. What, if anything, would you like to change in option 2 the delegated testing for ER operators?

|  |
| --- |
|   I would propose that this delegated testing is rolled out to PSV earn recognition operators initially as this would not require a change in legislation. The PSV industry and the DVSA have a long history in working together when new systems come in to play and I am sure that this cooperation would continue going forward. |

**Option 3: reduced test content**

### Reduced test content

Reducing the content of the annual test for ER operators’ vehicles would, for example by removing some of the  items currently required in routine inspections or, in the longer term, that can be shown to be effectively monitored by in-vehicle systems.

The vehicle would still be required to be presented for assessment against any aspects that remain within the annual roadworthiness inspection and existing in-use requirements for vehicle condition would also remain across the whole range of items.

### 31. What:

|  |  |  |
| --- | --- | --- |
| advantages do you believe less burdensome testing Would bring to an operator?    |

|  |
| --- |
|   none |

 |
| disadvantages do you believe less burdensome testing Would bring to an operator?    |

|  |
| --- |
|   The operator would still be required to inspect and check every item on the vehicle so by reducing the number of items checked on test is no benefit to the operator. The operator has to ensure that their vehicles are in a safe road worthy condition, so all items need to be checked. |

 |

### 32. What impact do you think less burdensome testing would have to:

|  |  |  |
| --- | --- | --- |
| ATFs?    |

|  |
| --- |
|   Very little. It may reduce test time but not by a significant amount |

 |
| non-ER operators?    |

|  |
| --- |
|   |

 |
| other areas?    |

|  |
| --- |
|   |

 |

### 33. Do you believe there are risks to road safety if option 3 is implemented?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option 3: reduced test content’) |
|    | Don't know (Go to ‘Option 3: reduced test content’) |

**Reduced test content: road safety risks**

### 34. What risks and how could these be mitigated?

|  |
| --- |
|  Who is to say what items no longer need to be tested?? This can only be achieved by monitoring wear rates of components. This process is difficult to monitor and would require constant changes to the testable items. |

 **Option 3: reduced test content**

### 35. What are the practical considerations of less burdensome testing for:

|  |  |  |
| --- | --- | --- |
| operation of vehicles abroad (compliance with other countries regulation)?    |

|  |
| --- |
|  The operator will have to maintain every item on their vehicle whichever country it is operated in? |

 |
| transitionary measures?    |

|  |
| --- |
|   |

 |
| other practical considerations not covered?    |

|  |
| --- |
|   |

 |

### 36. What, if anything, would you like to change in option 3 the streamlined test for ER operators?

|  |
| --- |
|   |

**Option 4: improved service provision for ER operators**

### Improved service provision

Improved service provision proposes that Driver and Vehicle Standards Agency (DVSA) focuses its service improvement efforts on ER operators in order to minimise other testing burdens beyond those mentioned in our other proposed options and which would not require legislative changes to implement. Such initiatives could, for example, include:

|  |
| --- |
| * complete or greater guarantee of requested ATF slots for ER operators (and potentially those providers nominated by them)
 |
| * full move away from tracking tester utilisation, offset by different fee arrangements
 |
| * full flexibility around days or hours worked to match maintenance requirements
 |

### 37. What:

|  |  |  |
| --- | --- | --- |
| advantages do you believe improved service provision would bring to an operator?    |

|  |
| --- |
|  We don't believe there will be much benefit as a lot of the suggestions have been made in the past and proven not to work. DVSA initially said that when ATFs were set up that there would be a day allocated for each tester and that the operator could decide how many tests were carried out on that day. This proved to be very inefficient as an operator could potentially book a tester for the whole day but only provide one vehicle for test on that day. DVSA has offered flexibility around testing hours and days, but industry did not take up the offer as it was not convenient to test out of hours. The number of vehicles to make this cost effective was prohibitive. |

 |
| disadvantages do you believe Improved service provision would bring to an operator?    |

|  |
| --- |
|  DVSA has been trying to achieve this for a long period, but recruitment has always held them back and I can’t see that changing. |

 |

### 38. What impact do you think improved service provision would have to:

|  |  |  |
| --- | --- | --- |
| ATFs?    |

|  |
| --- |
|  Little if any |

 |
| non-ER operators?    |

|  |
| --- |
|  Any impact is likely to be negative if ER operators are prioritised |

 |
| other areas?    |

|  |
| --- |
|   |

 |

### 39. Do you believe there are risks to road safety if improved service provision is implemented?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option 4: improved service provision for ER operators’) |
|    | Don't know (Go to ‘Option 4: improved service provision for ER operators’) |

**Option 4: road safety risks**

### 40. What risks and how could these be mitigated?

|  |
| --- |
|  Operators have struggled in the past to obtain test slots in some regions. Recruitment costs are continuing to rise and the DVSA struggle to match private sector wage rates in some areas. The cost of providing MOT testers would move from the government purse to the private sector. |

 **Option 4: improved service provision for ER operators**

### 41. What are the practical considerations of improved service provision for:

|  |  |  |
| --- | --- | --- |
| DVSA staffing levels?    |

|  |
| --- |
|   The requirement for staffing levels would need to rise significantly in order not to disadvantage non-ER operators |

 |
| the potential adjustments to minimum fee levels currently set in ATF contracts.    |

|  |
| --- |
|   The funding of the scheme would have to be reviewed |

 |
| transitionary measures?    |

|  |
| --- |
|   |

 |
| other practical considerations not covered?    |

|  |
| --- |
|   |

 |

### 42. In your view:

|  | all operators? | ER operators only? |
| --- | --- | --- |
| the greater guarantee of requested ATF slots should apply to: |    |    |
| fully moving away from tracking tester ‘utilisation’, offset by different fee arrangements should apply to: |    |    |
| full flexibility around days and hours worked to match maintenance requirements should apply to: |    |    |

Why?

|  |
| --- |
|   The current scheme is inefficient, and I cannot see that improving without reducing the number of vehicles being tested by the DVSA to a more manageable level by removing the earned recognition operators’ fleets this would free up the DVSA system. |

### 43. What, if anything, would you like to change in option 4 the improved service provision?

|  |
| --- |
|   |

**Implementation**

### 44. Would you like any other additional changes to be made to the ER scheme?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Option preference’) |
|    | Don't know (Go to ‘Option preference’) |

**Additional options**

### 45. What additional changes would you like and why?

|  |
| --- |
|   |

**Option preference**

We are asking not only the options you would like to have implemented but also the order in which those, as it may be different to our own, options should be implemented and why.

Our options are:

|  |
| --- |
| * option 1: increase the time between tests for ER operators
 |
| * option 2: delegated testing for ER operators
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision for ER operators
 |

### 46. With regards to implementation of our 4 options your preferred approach to implement:

|  |  |
| --- | --- |
|    | one of the four options? |
|    | two of the four options? (Go to ‘Two options’) |
|    | three of the four options? (Go to ‘Three options’) |
|    | all of the four options? (Go to ‘Four options’) |

**Single option**

The options are:

|  |
| --- |
| * option 1: increase the time between tests for ER operators
 |
| * option 2: delegated testing for ER operators
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision for ER operators
 |

### 47. Your preferred approach is to have only implement option:

|  |  |
| --- | --- |
|    | 1 implemented? |
|    | 2 implemented? |
|    | 3 implemented? |
|    | 4 implemented? |

[After answering go to ‘Risks’]

**Two options**

You have stated you would like 2 of the 4 options implemented.

The options are:

|  |
| --- |
| * option 1: increase the time between tests for ER operators
 |
| * option 2: delegated testing for ER operators
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision for ER operators
 |

### 48. The options and sequence you think your options should be applied in is the:

|  |  |  |
| --- | --- | --- |
| first implemented option of.    |

|  |
| --- |
|   |

 |
| second implemented option of?    |

|  |
| --- |
|   |

 |

[After answering go to ‘Risks’]

**Three options**

You have stated you would like 3 of the 4 options implemented.
The options are:

|  |
| --- |
| * option 1: increase the time between tests for ER operators
 |
| * option 2: delegated testing for ER operators
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision for ER operators
 |

### 49. The options and sequence you think your options should be applied in is the:

|  |  |  |
| --- | --- | --- |
| first implemented option of.    |

|  |
| --- |
|   |

 |
| second implemented option of?    |

|  |
| --- |
|   |

 |
| third implemented option of.    |

|  |
| --- |
|   |

 |

[After answering go to ‘Risks’]

**Four options**

You have stated you would like all 4 of the options implemented.

The options are:

|  |
| --- |
| * option 1: increase the time between tests for ER operators
 |
| * option 2: delegated testing for ER operators
 |
| * option 3: reduced test content
 |
| * option 4: improved service provision for ER operators
 |

### 50. The options and sequence you think your options should be applied in is the:

|  |  |
| --- | --- |
|    | same as our proposed order? (Go to ‘Risks’) |
|    | different to our proposed order? |

**Alternative 4 option order**

### 51. The options and sequence you think your options should be applied in is the:

|  |  |  |
| --- | --- | --- |
| first implemented option of.    |

|  |
| --- |
|   |

 |
| second implemented option of?    |

|  |
| --- |
|   |

 |
| third implemented option of.    |

|  |
| --- |
|   |

 |
| fourth implemented option of?    |

|  |
| --- |
|   |

 |

**Risks**

Any change to the vehicle testing regime has the potential to increase risk, particularly if there are fewer tests. It would be critical to ensure the rigour of the test is not compromised and is sufficiently comprehensive, as well as ensuring testers have sufficient independence. For all options, careful consideration will be given to any potential impacts on road safety or air quality.

### 52. In your view what risks, if any, to air quality does option:

|  |  |  |
| --- | --- | --- |
| 1 pose?    |

|  |
| --- |
|   A slight improvement in air quality as the number test movements will drop by 50% for earned recognition operators |

 |
| 2 poses?    |

|  |
| --- |
|   A considerable improvement in air quality as vehicles would no longer be required to travel to alternative test stations especially if they have their own test stations on site. Plus, DVSA staff will not be needed to travel to all of the 530 ATFs |

 |
| 3 poses?    |

|  |
| --- |
|   no improvement at all |

 |
| 4 poses?    |

|  |
| --- |
|   no improvement on air quality |

 |

### 53. Do you believe there are other risks that need to be considered?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Other considerations’) |
|    | Don't know (Go to ‘Other considerations’) |

**Other risks**

### 54. What risks?

|  |
| --- |
|   |

**Other considerations**

### 55. In your view what, if any, other changes need to be made in order to ensure public confidence in road safety controls if any of our options to vehicle testing were implemented for:

|  |  |  |
| --- | --- | --- |
| non-ER operators?    |

|  |
| --- |
|   There will be no changes for non-ER operators so public confidence should not change |

 |
| ER operators?    |

|  |
| --- |
|   A robust system of monitoring and training of vehicle testers will ensure public confidence in the scheme. The scheme should operate in the same way as car MOT testing with trained individuals who must carry out refresher courses. The public perception of the car MOT scheme is that it is working well so why not in the PSV industry. Earned recognition operators will employ the people testing their vehicles. These earned recognition operators will be testing vehicle that are covered by the operator licencing scheme. If it was found that the vehicles were not being tested to the appropriate standard the operator could lose their repute and ultimately their operator’s licence resulting in them having to cease trading. This sanction is far greater than the current MOT programme. |

 |

We currently collect as part of the application of for the ER scheme require applicants to supply [key performance indicators (KPIs) [opens in a new window]](https://www.gov.uk/guidance/dvsa-earned-recognition-join-the-scheme#monitor-your-performance) on the areas of:

|  |
| --- |
| * maintenance
 |
| * driving activity
 |

We are researching your view towards if these KPIs should only be sent electronically to us.

### 56. Do you agree or disagree that ER key performance indicator data should only be supplied to us electronically?

|  |  |
| --- | --- |
|    | Agree (Go to ‘Other considerations’) |
|    | Disagree |
|    | Don't know (Go to ‘Other considerations’) |

**Disagree with electronic only collection.**

### 57. Why not?

|  |
| --- |
|   This will ultimately lead to operators having to purchase electronic systems. The systems will have to be approved by the DVSA and could be viewed as you can only be an earned recognition operator if you are using this DVSA approved software. It could affect people’s view of impartiality of the DVSA |

**Other considerations**

### 58. Would you support any of our proposed option alterations being applied beyond ER operators to all heavy goods vehicles and public service vehicle operators instead?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Changes applied’) |
|    | Don't know (Go to ‘Changes applied’) |

**Application beyond ER operators**

### 59. You would support:

|  |  |
| --- | --- |
|    | all of the options being applied to all heavy goods vehicles and public service vehicle operators? (Go to ‘Changes applied’) |
|    | some of the options being applied to all heavy goods vehicles and public service vehicle operators? |

**Options to be implemented to all heavy goods vehicles and public service vehicle operators.**

### 60. You would support option:

|  |  |
| --- | --- |
|    | 1 being applied to all heavy goods vehicles and public service vehicle operators? |
|    | 2 being applied to all heavy goods vehicles and public service vehicle operators? |
|    | 3 being applied to all heavy goods vehicles and public service vehicle operators? |
|    | 4 being applied to all heavy goods vehicles and public service vehicle operators? |

**Changes applied.**

Driver and Vehicle Standards Agency (DVSA) currently commits to not routinely stopping ER operator vehicles as part of its roadside enforcement activities.

However we will need to consider if a structural change in how enforcement is funded, or other fee changes, would need to be implemented with any change to testing for ER operators. Examples of new approaches could include a fee for ER or increases in test fees for those that still need tests.

### 61. How would you expect DVSA to determine compliance if any of these options were implemented?

|  |
| --- |
|   In the PSV industry the DVSA rarely stop vehicles at the roadside because of the implication to passengers. The PSV industry accepts that the DVSA can enter their premises at any time to inspect vehicle condition. It is also understood this might take place at sites where a large number of vehicles congregate for example racecourses, exhibition centres and bus stations. We don't see this changing going forward. |

**Other considerations**

### 62. In your view what barriers, if any, exist for smaller operators that may prevent them from joining the ER scheme?

|  |
| --- |
|   Currently I don't see any barriers for smaller operators to join the ER scheme. However, if the requirement for electronic inspection data becomes mandatory, this may put off smaller operators. The smaller earned recognition operators might use contract maintenance or main dealers. We think, we would roll this out to sub-contractors, as this will be a requirement at some point in the future so it might as well be implemented at the start. |

### 63. What, if any, views do you have on the practical arrangements relating to these changes to testing for operators:

|  |  |  |
| --- | --- | --- |
| leaving the ER scheme?    |

|  |
| --- |
| Operators will have to consider if the scheme offers them any benefits and could consider leaving if no reform takes place.If the proposals are implemented, operators will have a greater incentive to remain part of the scheme. |

 |
| being removed from the ER scheme?    |

|  |
| --- |
|   If the operator doesn't comply with the ER scheme, then they should be removed. Depending on which options are implemented, this could mean that vehicles need to be tested again (by DVSA) quickly. |

 |

### 64. What views, if any, do you have on the practicalities of identifying vehicles that would be in scope of our changes to the heavy vehicle test?

|  |
| --- |
|   As earned recognition is only relevant to PSV vehicles that are part of operator licencing scheme, I don't see the need for any additional identification |

### 65. Do you think different arrangements need to be made to ensure trailers are identified separately to heavy goods vehicles?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Other considerations’) |
|    | Don't know (Go to ‘Other considerations’) |

**Trailers**

### 66. Why?

|  |
| --- |
|   |

**Other considerations**

Some of these options, if implemented, could affect funding for DVSA enforcement.

Currently ER membership does not have an application fee amount.

### 67. How, in your view, do you think the loss of funding for DVSA enforcement might be mitigated?

|  |
| --- |
|   Enforcement funding needs to be reviewed I would suggest that a small levy should be placed on all operator licences.  |

### 68. Do you believe there should be an application fee for ER membership?

|  |  |
| --- | --- |
|    | Yes |
|    | No (Go to ‘Final comments’) |
|    | Don't know (Go to ‘Final comments’) |

**Fee**

### 69. You believe the fee charged for ER membership should be:

|  |  |
| --- | --- |
|    | under £50? |
|    | between £50 and up to £100? |
|    | between £100 and up to £150? |
|    | above £150 (in pounds)?

|  |
| --- |
|   |

 |

**Final comments**

### 70. Any other comments?

|  |
| --- |
|   We have been involved in the parallel MOT trial and the proposals that we have put forward should be implemented firstly in the PSV sector and then rolled out later to the HGV sector for earned recognition operators. I suggest you contact me so that I can supply the data and background work for our proposal and feel that this is necessary to move the industry forward. If this type of benefit which was offered at the earliest opportunity to earned recognition operators is not forthcoming, I can see the earned recognition scheme collapsing. I feel that would be a very negative outcome for all of the industry. The legislation does not have to be changed to allow the PSV industry implement this and it should be progressed.  |