ATFS EARN A SOLID PASS

A government review of the heavy vehicle annual test programme has found it to be essentially fit for purpose. It says: "The current system delivers the most fundamental need of customers, enabling vehicles to be tested and kept in service." But that is not to say that the system was always so, nor that it mightn't be improved, states the report (available via www.is.gd/elipib)

ehicle testing has had a difficult few years. Less than a decade after the ATF network was originally set up in 2009-2010, DVSA was cancelling an 'unacceptable' number of tests due to lack of testers in 2017. That led to the formation of an improvement programme in 2018 (see also www.is.gd/wuvuxi). Also that year, heavy vehicles including mobile cranes and breakdown vehicles which were previously exempt from annual servicing came into scope, adding to the demand. In 2018-2019, there were 432,778 HGV tests, 254,439 trailer tests and 77,766 PSV tests carried out.

And then came COVID, which brought a hard stop to all testing for three months from 23 March 2020. Later in the year, new legislation (the Business and Planning Act 2020) allowed testing to resume, but in a sequence prioritised by risk. Accompanying the new law was the demand from Parliament for a review of the system to determine if it is fit for purpose, if it can be improved to meet customer needs while delivering road safety and environmental benefits, considering both business as usual and the March-August 2020 period.

The review was led by DfT officials, with 'active and full involvement' of DVSA. It was assisted in 'all aspects' by a stakeholder panel, which met



six times in 2020. That included representatives of testing customers, testing and maintenance facilities, traffic commissioners, and most of the UK vehicle trade associations, including IRTE, as well as Logistics UK, RHA, SMMT, ATFOA, BVRLA and CPT, among others. Below are the key points.

1 SERVICE HAS IMPROVED

The report says: "Significant service delivery problems about heavy vehicle testing during 2017 were confirmed as having since been addressed in large part." Service delivery problems means confirmed tests that were cancelled. Although the report didn't state how bad it got, the percentage of ATF test reservations met by DVSA was 99.9% from April 2015 to February 2020, except for April 2017-March 2018, when the figure was 98.6%. It also said that now ATFs are cancelling more appointments than are DVSA.

And in the past few years, user surveys commissioned by DVSA indicate that approval ratings for its part of the ATF scheme have risen. In 2018, only 48% of ATFs surveyed said



that they were satisfied with the DVSA service; that rose to 84% in 2020. In 2019, 65% of operators said that they were satisfied with DVSA service; that rose to 83% in 2020.

2 THE CANCELLATION NUMBERS ARE NOT THE WHOLE STORY

The DVSA cancellation statistics are impressive; in fact they are an official DVSA KPI. But the report explains that they do not capture the whole picture of testing. The ATF model works like this: DVSA provides its employees, vehicle standards assessors (VSAs), to ATFs. ATFs collect test bookings from vehicle operators, and bid for VSA resource in quarterly booking rounds. DVSA then allocates those testers, providing a number of confirmed test slots, and from that ATFs then determine their capacity for the upcoming period. According to the report, DVSA generally only grants ATFs 80-85% of the tester capacity requested.

And although this process can work for operators booking in for a few months, the report acknowledges that those operators looking to clear



a prohibition notice in the short term can struggle to find an appointment.

Why does it work this way? Because DVSA's priority is to maximise the utilisation of its tester resource, to get the most for its money. Currently, ATFs use 93% of the testing time provided by DVSA, which amounts to 436 testers (as some are part-time, this number combines the total working time into an equivalent number of full-time posts).

This is important because annual test fees, which vary by vehicle type but are broadly proportional to the amount of time taken for the test, are

fixed by law and cannot be changed. There is only so much to cover the service. In fact, it's not quite enough: in 2019-2020, testing income was £57.9m and expenditure was £55.8m, while compliance income (mostly from enforcing test fees) was £47.5m and expenditure was £52.6m. In other words, DVSA vehicle testing was in the red by £3m. While DVSA says that the aim is to deliver the testing service with the existing fee structure, it forecasts that its vehicle services section that includes this operation will be in deficit the next five years.

The report points out that if DVSA provided all of the resource

requested by ATFs, there would need to be another 65 full-time equivalent VSAs, and utilisation efficiency would drop to 80%. Similarly, if it ended a moratorium on opening new ATFs in place since 2017 (which the report actually supports), the network could also face testing shortages. There are 575 ATFs now in operation (including Scotland's Elgin Truck & Bus, pictured, and Keltruck Nottingham, p22), with another 50 waiting for authorisation.

The authors observe: "There is a tension between the aim for DVSA to deliver the service within the current fee structure and levels and with the desire for greater flexibility in how tester resource can be deployed by ATFs. Reconciling this tension would need a careful balance."

3 THE SYSTEM MAY BE AN IMPORTANT BOOST TO UK VEHICLE PARC ROADWORTHINESS

Over the last decade or so, first-time MOT failure rates have declined by about half, perhaps because of increased focus from dealer groups (see also www.is.gd/suyufa). That's great news. But it's not the only measure of roadworthiness. DVSA profiles operators and roadside enforcement teams target higherrisk operators. Roadside vehicle prohibition rates haven't really changed over the same period. Could this be an artefact of their deliberate

FLEET COMPLIANCE SURVEY: ROAD PROHIBITION RATES FOR HGVS AND TRAILERS, ADJUSTED FOR TARGETING

	2010	2011	2012	2013	2014	2015	2016	2017
GB HGV vehicles checked	3,609	2,445	2,621	2,694	2,575	2,446	2,530	2,525
GB HGV vehicles prohibited	374	252	259	275	240	230	279	269
HGV prohibition rate (%)	10	10	10	10	9	9	11	11
GB HGV trailers checked	1,712	1,397	1,370	1,408	1,375	1,249	1,360	1,392
GB HGV trailers prohibited	227	170	161	180	135	125	159	146
Trailer prohibition rate (%)	13	12	12	13	10	10	12	10

ource: DfT and DVSA

"The heavy vehicle testing system is not in crisis. Its operation, however, results in a greater degree of wider cost and inconvenience for customers and testing facilities than they believe is reasonable"

targeting of certain operators? A DfT study used a controlled sample to try to remove the bias in the numbers. The results, as shown in the table p21, also indicate a static picture for HGV roadworthiness, and perhaps a slight decline for trailers (no PSV data was published). From this, the report's authors speculate that what has really changed is the effort that goes into test preparation, rather than absolute in-service vehicle condition.

They say: "There is a disconnect between improving trends in annual test pass rates and static underlying roadworthiness levels. This indicates that vehicles are heavily prepared for test from their 'normal' operating condition. The very existence of the test does create a positive improvement, bringing all vehicles to the minimum standard at least once a year."

They go on to say that fundamental to the objectives of, and legal requirements for, annual vehicle testing, is examiners' independence. While they note the great interest of industry to delegate testing to third parties, that issue falls outside of their remit, so they do not pass judgement.

4 ANNUAL TESTS NEED NOT NECESSARILY BE ANNUAL

Although first-time MOT failure rates didn't sync with roadside enforcement data, it did with OCRS score, and very well too. Across HGVs and PSVs, those operators with better OCRS ratings had fewer MOT first-time fails. And the picture was even more dramatic for those operators enrolled on Earned Recognition.

The authors scented an opportunity here. Over the last six months, well-performing operators were allowed to extend the statutory inspection cycle of their vehicles to help VSAs get through the COVID vehicle backlog. (The review did

22



not comment on any effect of the COVID testing hiatus on road safety). Perhaps, the authors suggest, such arrangements could be made permanent. That would further reduce the load on VSAs, and reward good operators. They write: "service improvement work may benefit in not being bounded by the constraint of testing needing to be annual for Earned Recognition operators." Provided that investigations showed that this wouldn't affect road safety, they add.

5 FUTURE INITIATIVES MIGHT HELP (BUT THEN THEY MIGHT NOT)

The report says that some stakeholders said that there was general dissatisfaction about the way that test bookings are made, and also complained that there should be a single point of contact for issues with the ATF testing system (for which, in fact, responsibility is split between DVSA and DfT, the report points out). Still, it recommends that DVSA try to improve transparency of booking.

And in fact, DVSA has introduced an 'ATF Capacity' service to help operators find an empty testing slot, and to escalate problems. However, given its novelty, this was not reviewed.

The report did say that other digital services are being planned in the run-up to 2025. The Commercial Vehicle Services project will create software (an app) that captures test results in real time; a new system to manage test data and store technical records; and a simplification to ATF payment processes.

In the here and now, industry has difficulty engaging with DVSA, the review finds. It argues that DVSA should consider "a reset of the relationship and way its leadership liaises with representatives of service users in the road freight and passenger industries, as well as providers of testing facilities."

In addition, it observes: "The three-way DVSA-ATF-operator relationship is complex and there is some dissatisfaction and ambiguity about how it works." To that end, roles and responsibilities of each of the parties - DVSA, ATF and operators involved - were spelled out in an appendix.

But in general, the review found that the ATF network is getting the job done. Much of the criticism levelled against it comes from the fundamental trade-off between the demands of customer service and maximising limited resources.

It summarises: "The heavy vehicle testing system is not in crisis. Its operation, however, results in a greater degree of wider cost and inconvenience for customers and testing facilities than they believe is reasonable. The efficient use of testing staff required to balance DVSA scheme accounts under managing public money obligations and keep fees down is associated with testing facilities having to operate in ways that may be less than optimally efficient for them or for their customers."