

# DVLA CONSULTATION ON FEE PROPOSALS

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## SUMMARY

1. In 2003, the Driver and Vehicle Licensing Agency (DVLA) took a number of initial steps to modify its fee structures, partly to move towards a regime that better supports its policy outcomes and partly to accommodate immediate funding pressures. This year, it is taking a forward look in terms of completing its alignment for policy support and the introduction of new policy initiatives over the next years. This specifically includes:

- replacement of the agency’s vehicle registration systems;
- the recall of old paper driving licences; and
- the commencement of the 10-yearly renewal cycle for photocard driving licences.

2. This consultation sets out the different options for covering the costs involved in these new initiatives and seeks feedback on the preferences of both organisational stakeholders and the public for the fee structures to be implemented.

3. The initiatives funded through the revised fees will enable DVLA to meet its objectives of increasing road safety through more secure driver and vehicle keeper identification and authorisation, including the potential introduction of more secure driving licences. The proposals will also enable better vehicle identification in future and help, in conjunction with the police, to reduce vehicle and wider crime.

4. Changes already in train mean that retaining the current fee structure is not possible. However, there are a number of options as to how we can cover the increased costs we face. For simplicity, we have reduced these to four options, although some further variations or combination of these could be viable.

5. Your views are sought on the:

- a) principles underlying the changes;
- b) impact of the four options on your own sector;
- c) indicative fee levels proposed and preferred option for structure.

6. A further, more detailed, consultation will be undertaken on the specific fee levels once the preferred option has been decided and the actual costs faced calculated with greater precision nearer to the implementation date.  
7. Your views are important to the Agency. Responses may be sent by post, fax or e-mail to the address below by 8th November 2004.

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## INTRODUCTION

8. The Driver and Vehicle Licensing Agency (DVLA) is required to recover the costs of its operations through fees collected for a number of the services it delivers. Last year's review of the fee structures introduced greater flexibility for funding the vehicle and driver licensing activities. In the near future, the Agency will introduce a number of new initiatives – expanding the services it provides and improving access to, and use of, them. This includes a significant expansion in the scope of web-based services for both private and business customers. This paper proposes a number of options that cover the costs of these activities.

9. One of the key activities is the start of the 10-yearly renewal cycle for photocard licences, starting in 2007/08. Photographs have to be renewed every 10 years to ensure that the card retains an accurate likeness of the licence holder. However, before this, we need to recall the remaining paper licences in circulation, confirm the identity of these drivers and issue new photocard licences. As paper licence holders were not subject to the same level of checking as those who have obtained photocard driving licences, the recall of these licences should provide significant benefits for the integrity and security of the drivers system. Without a recall exercise about 10 million paper licences would still remain in circulation by the end of this decade.

10. The second European Directive on the driving licence standardised the format of the driving licence throughout Europe. The third European Directive, currently in draft, provides for enhanced security features and a single licence format across Europe. This means that the old paper licences would have to be phased out before 2010.

11. This consultation paper sets out the principles we propose to adopt for a fair and equitable system of fees and charges. This also underpins the key policy objectives of the Department for Transport (DfT) in terms of encouraging drivers to register and learn to drive properly, whilst recovering from vehicle users the full cost of use of the road and the supporting services. This continues the fees reform initiated in 2003 and provides a platform for the longer term, so that the funding is both stable and sustainable.

12. The proposals will affect all motorists - vehicle keepers, new and prospective drivers, the Motor Industry and related businesses. Given the relatively modest level of fees indicated<sup>1</sup> and the principle of ensuring that the overall burden is balanced and distributed, no exemptions are currently planned. However, respondents are encouraged to set out any proposals that they may have in this regard bearing in mind the principles set out in paragraph 22.

13. Changes affecting the driver licensing fee structure in Northern Ireland will be dealt with separately by the Department of the Environment in Northern Ireland (DoENI), who sponsor the Driver and Vehicle Licensing Agency Northern Ireland (DVLNI). It is anticipated that the changes would be introduced simultaneously across the UK.

14. Your views are sought by 8th November 2004. It is planned that any fee changes arising from this consultation will be brought after the 2005-06 financial year

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<sup>1</sup>Calculations based on the AA cost model for an average car and mileage (including depreciation) suggest that all-inclusive annual running costs are of the order of £4,000 - £4,400 each year.

## BACKGROUND

15. DVLA, on behalf of the Secretary for State for Transport, is responsible for the driver and vehicle registers in Great Britain and the vehicle register in Northern Ireland. DVLNI is responsible for driver registers in Northern Ireland. We are required to recover the costs of these activities through fees levied for the full range of services. We are looking to integrate many of these business services through streamlined processes and internal systems that deliver efficiencies to support the recent findings, from Sir Peter Gershon's review of public sector efficiency, that the whole of Central Government could and should work more efficiently and cost effectively.

16. DVLA contributes to key DfT policies of improved road safety and Home Office policies of crime reduction, as well as improving the environment. With the other delivery agencies for Government, it shares the objectives of improving public services and access to these services, partly through the provision of new electronic channels.

17. Our contribution to road safety and crime reduction is primarily achieved through the maintenance of accurate records, thus enabling enforcement direct from the vehicle register and the tracing of drivers and vehicle keepers by police, courts and local authorities. Record accuracy has already been improved through, amongst other things, the introduction of continuous registration earlier this year, direct links between Post Offices and our registers, web-enabled capture of data (via the internet, telephone and joint working with other agencies), the enabling of more user-friendly e-delivered services, and enforcement.

18. We are now seeking to contribute further to road safety and crime reduction by replacing paper licences with more secure card licences. The current photocard licences have a ten-year life and the renewal cycle for these will begin in 2008.

19. The 2003 fee review and consultation focused on bringing together (“pooling”) the costs of the driver and vehicle businesses, previously treated separately, resulting in the Department for Transport (Driver Licensing and Vehicle Registration Fees) Order 2003, made under Section 102 of the Finance (No 2) Act 1987. It was largely limited to addressing immediate funding issues and the convergence of the separate driver and vehicle records and processes.

20. This consultation now considers the pressures arising from the need to renew photocard licences, the proposed recall of the remaining paper licences and replacement of our ageing vehicles registration systems. We can now consider the longer-term view of funding these pressures and consider options that were not possible in last year’s review.

21. The consultation itself covers only the core driver and vehicle statutory services

## **PRINCIPLES**

22. In constructing these proposals, a number of principles have been adopted:

a) encouragement will be provided as far as possible for drivers to join the registration systems, to learn to drive properly and to observe safe driving behaviours (we aim specifically here at the young and the ½m of the population currently estimated to be driving without a valid licence);

b) disqualified drivers, either through bad driving or related to alcohol offences, will bear the full costs of their offences (the objective is to encourage good driving though reducing costs but penalise offenders and therefore discourage bad behaviour – noting that the costs to DVLA of the additional checks needed should not be borne by compliant drivers);

c) drivers who have medical conditions that are notifiable will not be discouraged from notification by the imposition of charges (encouragement is needed under the current self-notification regime and financial obstacles would reduce the notifications we seek to encourage);

d) vehicle keepers will all share in the funding of the registration system, (currently, vehicle keepers who do not undertake first registrations do not provide any funding support for the vehicle registration system);

e) drivers or vehicle keepers who need duplicate or replacement documents will continue to bear the full cost of document and processes so as not to burden the compliant majority (it does not seem fair that drivers and vehicle keepers who safeguard their documents should subsidise those who are not so careful).

23. We also have to simplify our fee structures. This would help the introduction of electronic services, removing associated fees as far as possible while making customer interactions easier. This also benefits DVLA by reducing administrative costs. At the same time, we will be seeking to introduce easier customer payment channels.

## **THE PRESENT FEE STRUCTURE**

24. The 2003 fee review began rationalising the fee systems developed over the past 30 years. During this time services and related fees have advanced incrementally, with separate fees legislation covering both drivers and vehicle keepers.

25. The resulting improvements are being continued, in addition to the principles adopted, by moving to:

a) simplify processes for the motoring public and DVLA;

b) facilitate e-services through simplified transactions – minimising payment transactions;

c) improve the cost-efficiency of the processes for both the motoring public and DVLA.

26. DVLA's Strategic Agenda and Business Plans set out further improvements in these areas – by extending our electronic vehicle licensing, introducing joint driver/vehicle address change notifications, introduction of Motor Industry Portal, providing commercial “customer accounts” with direct debit facilities.

27. Details of the current fee structure can be found at Annex A.

## **THE PROPOSED FEE STRUCTURE**

### **Principles**

28. In this, the next stage of the fee re-structuring, we seek to cover the costs of the changes noted in paragraphs 8 to 10 in a fair way that complies with the principles set out in paragraph 22 and to revisit the distribution of current costs across the fee structure.

### **The Options**

29. There is no status quo option in terms of fees as we have to meet significantly increased costs over the next years to meet legislative changes. The “minimum change” option would be to set specific fees to cover costs for the recall of paper driving licences and the renewal of ten-year photocard licences. This would involve keeping other fees at close to existing levels with reduced changes only set in place through the annual processes to meet systems renewal costs. However, this would not allow us to continue with the fees restructuring and reform that began in 2003 by revisiting the spread of cost coverage by category of fee payer. By adopting this minimal approach we would be unable to re-structure fees to remove obstacles to compliance or to increase our contribution to road safety. The minimal option is, thus, not included in these proposals.

30. The four options given below include fee levels at indicative levels at present. The overall impact of the various mixes of fees/levels in each option are equivalent in that they all provide approximately the same required funding for the changes noted in paragraphs 8 to 10, based on current projections of volumes and behaviours. We will need to consult again on the precise level of fees once the preferred option is chosen and the current estimates refined nearer the introduction date. At present, we are consulting only on what mix of fees and charges might best meet both our requirements and those of our customers.

31. In brief, we discuss the potential introduction of four new fees, although the proposals at the same time reduce or abolish fees for a number of specific services. The Regulatory Impact Assessment (RIA) included later in this document set out in more detail the overall impact and values associated with each of the options. The four possible fees are explained in greater detail in the options set out below, but are for:

- renewal of photocard licences under the 10-yearly cycle instituted;
- provision of photocard licences under a paper licence recall initiative;
- registering keeper changes on sale of vehicles in a similar way to registration of new vehicles as currently operated;
- maintaining the vehicle register entries for vehicles on an annual basis.

## **OPTION 1**

32. The increased costs arising from the ten-year photocard licence renewal and paper licence recall exercise would be offset by charging fees. The indicative fees used in this consultation are £19 for the former (in line with duplicate driving licence fee) and £5 for the latter. This latter seems equitable as it puts those who would be required to surrender their paper licences in a more equal position with those who have already transferred to the photocard renewal cycle, but is at a significantly reduced cost to current practice.

33. Drivers who currently move from a paper licence to a photocard licence for reasons other than change of details (currently and in future free of charge) have to pay a £19 fee. The scale of the recall exercise means that we would be able to treat this as a one-off exercise and charge what are effectively marginal rates.

34. We would also introduce a Change of Keeper Fee. This fee would be payable by the purchaser and paid over by the seller when he/she notifies DVLA of the change of keeper. The payment of a fee would reinforce the need for sellers to have the keeper details changed to those of the purchaser in order to comply with Continuous Registration requirements i.e. on payment of a fee buyers would expect sellers to comply with their statutory obligations in order for a new registration document to be issued. Failure to enclose the fee would result in the change of keeper details not being effected and the liability of the vendor thus not extinguished under Continuous Registration. In process terms this is very similar to that undertaken by motor dealers during first registration so that we would align the handling of used car sales with the arrangements already in place for new car sales. A fee would thus be payable by

all new keepers for the update of the register with their details, whether new or old car keepers. The indicative level for this fee is £7.50.

35. The level of the first registration fee, which was increased to £38 under the 2003 restructuring, has been reviewed as a result of representations made during the 2003 consultation. The indicative level would be set at the lower level of £30. This reduces the burden on industry as well as private buyers of new vehicles, whilst ensuring that all vehicle keepers provide a fair share of funding support through the wider change of keeper fee.

36. We also abolish the fee for first driving licences for applicants under the age of 21. New drivers currently have to pay £38 for their first provisional licence. This would be a major step in removing disincentives from application for first licences and help to maximise the capture of new driver details at the start of their driving activities. This approach would contribute to greater road safety by encouraging young people to obtain a licence and go through the proper tuition/testing route to obtain a full licence. It would also enable DVLA /police to enforce from the record as the records would be that much more complete. Specifically, it would encourage young motorcyclists to register, thereby reducing one of the greatest current road safety risks Upgrade to full licence following test pass would continue to be free of charge (subject to the transitional arrangements currently in place) as would notification of change of address and personal details.

37. We would continue to charge drivers of the age of 21 and over a fee of £30 for a first licence (provisional or exchange). It is felt that persons aged 21 and over will have largely completed their full-time education and through employment opportunities will have achieved a degree of financial independence. The fee for reissue after revocation, would similarly be reduced to £30.

**Your views are sought on the proposals at Option 1**

## OPTION 2

38. Under Option 2, the abolition of the fee for provisional driving licences for applicants under the age of 21, the Change of Keeper fee of £7.50, the paper licence recall fee of £5 and the first provisional licence fee of £30 for those aged 21 and over are the same as in Option 1.

39. However, the 10-yearly renewal of photocard licences would be free. This would be consistent with the Replacement Driving Licence (i.e. on change of details, such as name on marriage) and addition of entitlements to existing licences, currently free of charge. This would encourage more people to renew their licences at the end of the ten-year validity period and again would contribute to a more accurate record for each driver. This also provides for significant gains in efficiency in handling these transactions – both from a DVLA and driver perspective.

40. In order to compensate for the funding shortfall and spread the related costs for customers, we would introduce an Annual (re-)Registration Fee for vehicles at an indicative rate of £2.50 (per annum). This fee is for annual confirmation of registration details, the costs of which are currently met by cross-subsidy from other fees. The funding arrangements are hence made more transparent and linked to a much greater extent to the usage of our services and linked to the costs incurred.

41. It is envisaged that this fee would be collected alongside vehicle excise duty (VED) and therefore should not involve any further effort or administration cost on the part of the payer or DVLA. This payment would be required for those vehicles registering under the Statutory Off Road Notification (SORN) and those currently exempt from payment of VED but requiring a Nil disc at the point of their annual registration. The payment of the fee would reinforce the requirement to ensure that the registration of the vehicle was current and all details updated. This change would cover the cost of updating the record and maintaining the vehicle register systems.

42. We believe that such an annual fee, collected in this way, would contribute both to ease of service and operational efficiency. The level at which this is set is clearly determined by which other fees are subsumed within it. For this Option 2, a minimum level is assumed, but the impact of subsuming further fees is explored in the following options..

43. These changes would mean the vehicle first registration fee would be reduced to £25.

**Your views are sought on the proposals at Option 2**

## OPTION 3

44. This option follows on from Option 2, but with the charge for the paper licence recall also removed – effectively subsumed also into the annual fee.

45. This would encourage a higher compliance from the public improving the quality and reliability of the drivers' record. There would be no excuse for not participating in the recall exercise and the timing of the recall would be within the DVLA control and would smooth the transaction volumes of the future. The abolition of the fee for provisional driving licences for applicants under the age of 21, the fee of £30 for first driving licence applicants aged 21 and over and the Change of Keeper fee of £7.50 are retained as in Option 2.

46. The Annual Registration fee would be increased to £3.00 and the vehicle first registration fee reduced to £28.

**Your views are sought on the proposals at Option 3**

## **OPTION 4**

47. In this option, we would provide free of charge at the point of service delivery:

- a) 10-year renewals of photocard licences;
- b) paper licence recalls;
- c) provisional driving licences for those under the age of 21, and
- d) the Change of Keeper transaction.

48. The only new fee retained is the Annual Registration fee, which is increased to £4.50. As in options 1,2 and 3 the fee for other first driving licences will be reduced to £30.

49. The vehicle first registration fee in this option could still be reduced to £28. The reduction in the first registration fee offset by the introduction of a £4.50 annual registration fee would have little effect on the Motor Industry costs as a whole (see the RIA at Annex B). This annual fee could fund the policy changes in driver licensing without having to charge separately or directly for them. This option also redistributes the burden of costs between the first registration fee and the new annual fee, so that all vehicle keepers share the cost of funding the vehicle / driver registration systems.

50. This final option is the one favoured by DVLA as it provides us with best support for our road safety/crime reduction policies, reduces effort and administration for customers and ourselves and provides the simplest, most equitable solution from our perspective.

**Your views are sought on the proposals at Option 4**

## **REGULATORY IMPACT ASSESSMENT**

51. The changes outlined will result in costs to businesses and a draft regulatory impact assessment is at Annex B. Businesses that consider they will be affected by the proposals are invited to briefly describe the activities they undertake, explain how they will be affected and what change in costs and/or benefits it is anticipated would arise from each of the options.

## **DEADLINE FOR RESPONSES**

52. Please send any comments on the proposals in this consultation by 8th November 2004 at the latest to:-

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Morrison  
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53. Comments sent after this date will only be taken into account in exceptional circumstances.

54. If you have any questions about the consultation or require clarification of any matters in this document you may send them to Donna Woods by post, fax or e-mail to the address above.

55. Those being consulted directly are listed at Annex C.

56. Representative groups are asked to provide comments that summarise the views of the people and organisations they represent. It would be helpful if, when responding, representative groups could indicate the people and organisations they represent.

57. A hard copy of this document can be requested by writing to the above address.

## **DISCLOSURE OF INFORMATION**

58. DVLA may wish to publish responses to this consultation document in due course. Please ensure your response is marked clearly if you wish your response or name to be kept confidential. No reference to this point in your response will be taken as agreement to your reply being published. If you are replying by e-mail, we will assume that your consent overrides any confidentiality disclaimer that is generated by your organisation's IT system, unless

you specifically include a request to the contrary in the main text of your submission to us. Confidential responses will be included in any statistical summary of numbers of comments received and views expressed.

59. Please note that information supplied to the Department may be disclosed in response to a request under the Code of Practice on Access to Government Information. If you consider that any such information is either confidential or commercially sensitive, you should identify the information to the Department and specify any reasons for its sensitivity. The Agency will consult you about the information before making a decision on any Code of Practice on Access to Government Information request received.

## CODE OF PRACTICE ON WRITTEN CONSULTATION

60. This document seeks to comply with the “Code of Practice on Written Consultation” issued by the Cabinet Office. If you consider that this document does not, without reasonable explanation, comply with the consultation criteria reproduced at Annex D, please write setting out the areas where you feel the document departs from the criteria, to:

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### Annex A

## Current and Proposed Fee Options

### Driver Fee Structure

Transaction	Current Fee	Option 1 Fee	Option 2 Fee	Option 3 Fee	Option 4 Fee
<b>Driving Licence</b>					
First Driving Licence					
Under 21 years old	£38	Free	Free	Free	Free
21 years old and over	£38	£30	£30	£30	£30
Upgrading after test pass	Free	Free	Free	Free	Free
Renewals at age 70 plus	Free	Free	Free	Free	Free
Replacement Driving Licence (change of details)	Free	Free	Free	Free	Free
Duplicate Driving Licence (replace lost/stolen/destroyed)	£19	£19	£19	£19	£19
Exchange Licence					
Add entitlements	Free	Free	Free	Free	Free
Remove endorsements	£19	£19	£19	£19	£19
Paper Licence Recall fee (new)	N/A	£5	£5	Free	Free
Ten-yearly Renewal of Photocard Licences (new)	N/A	£19	Free	Free	Free
<b>Vocational Driving Licence:</b>					
First Provisional Entitlement	Free	Free	Free	Free	Free
Upgrading after test pass	Free	Free	Free	Free	Free
Renewal	Free	Free	Free	Free	Free
<b>Reissued Driving Licences:</b>					
Reissue after revocation	£38	£30	£30	£30	£30
Reissue for HRO's	£75	£75	£75	£75	£75
Reissue after disqualification	£50	£50	£50	£50	£50

### Vehicle Fee Structure

Transaction	Current Fee	Option 1 Fee	Option 2 Fee	Option 3 Fee	Option 4 Fee
Initial Vehicle Registration	£38	£30	£25	£28	£28
Replacement Registration Document (change of details)	Free	Free	Free	Free	Free
Duplicate Registration Document (replace lost/stolen/destroyed)	£19	£19	£19	£19	£19
Annual Registration Fee (new)	N/A	Free	£2.50	£3.00	£4.50
Change of Keeper Fee (new)	N/A	£7.50	£7.50	£7.50	Free

## Annex B

### Partial Regulatory Impact Assessment

#### Title of proposal

1. The continuation of the restructuring of fees which commenced with the 2003 review of fees. Amendments required to the Motor Vehicles (Driving Licences) (Amendment) Regulations 2004 and the Road Vehicles (Registration and Licensing) Regulations 2002.

#### Purpose and Intended Effect

2. To continue with the revision of the Agency's simplified fee structure introduced in 2003. The principles established in last year's review, and re-iterated below, are continued. The main changes proposed include a re-allocation of vehicle registration costs between the current first registration fee and a new annual registration fee. This restructuring will also allow the renewal of ten-year photocard licences and recall of paper driving licences to be handled without charging separate fees and would also allow for the free issue of driving licences to people under 21 years of age.

3. Changes resulting from the consultation will affect motorists in the UK. Any changes affecting the driver licensing fee structure in Northern Ireland will be dealt with separately by the Department of the Environment in Northern Ireland. Although it is expected that Northern Ireland will maintain drivers' fees levels broadly at parity with Great Britain.

#### Objectives

4. The 10-yearly renewal cycle for photocard licences will commence in 2007/08. Photographs have to be renewed every 10 years to ensure that the card continues to contain an accurate likeness of the licence holder. However, prior to this, we will need to recall the remaining paper licences in circulation so that the identity of these drivers can be confirmed and new photocard licences issued. It is estimated that, at the current rate of conversion from paper licences to photocard licences (either voluntarily on payment of a fee or free when changing details e.g. address change), that there would still be about 10 million paper licences still in circulation by the end of this decade. As paper licence holders were not subject to the same level of checking as those who have obtained photocard driving licences, the recall of these licences should provide significant benefits for the integrity and security of the drivers system. Technology improvements should provide us with added assurance that each register entry is unique, so that identity fraud and driving whilst disqualified should be minimised. For the purposes of these proposals and to arrive at a calculation of the indicative fee levels, we have assumed that by undertaking this recall exercise in the next few years some 12 million paper licences will need to be recalled, probably over a two year period. The paper licence recall and photocard renewal exercises are estimated to increase costs by between £75m and £95m per annum.

5. We also want to address the issue of those individuals who drive vehicles without being validly registered with DVLA. One obstacle to younger drivers following the proper path of obtaining a provisional licence and then proceeding to full driving entitlement through tuition and testing, is the cost of the provisional licence. Anecdotal evidence and focus group activity suggests that removing the impediment of the fee would encourage greater compliance with driver registration rules. Non-compliance with both driver and vehicle registration rules is

particularly a concern in the case of motorcyclists, as evidenced from our enforcement activities and tends to be concentrated in the younger age groups. Our proposals to issue first driving licences free of charge to those under 21 years of age, together with the reduction in the fee for 21 year olds and over, will contribute towards greater accuracy of the DVLA records.

6. The objective of improving the accuracy of the records is to provide a better basis for enforcement activities. Any inaccuracy in the record hinders enforcement by the police and courts for driving offences, including moving traffic offences and tracing offenders stopped by the police.

## **Background**

7. The DVLA is responsible for the accuracy and administration of both the driver and vehicle registers in Great Britain and the vehicle register in Northern Ireland. We are required to levy fees to cover our costs and the review aims to achieve this in an effective and equitable way for our customers.

8. The last fee review, conducted in 2003, brought together the costs of the driver licensing and vehicle registration systems that had historically been considered separately. The new fee structure was set to recover the combined costs by amalgamating both the driver and vehicle fees in a single fund. The principles established at the time of the 2003 review were:

- to simplify processes for the motoring public and DVLA,
- to encourage driver registration and learning to drive,
- to facilitate e-services through simplified transactions and
- to ensure offenders cover the full processing costs of issuing of new licences.

9. The revised fees in this document build on the work that commenced in 2003. To encourage compliance there is a desire to provide the renewal of ten-year photocard driving licences and the recall of paper driving licences free of charge. Any fee for these transactions would be seen as a disincentive to the driver to have his/her driving licence updated or to maintain his/her right to drive a vehicle.

## **Risk Assessment**

10. The proposals seek to minimise the risk that DVLA will fail to meet its financial objective to cover its costs, and support the prime, but in some instances conflicting, aim of improving the accuracy of its records.

## **Policy Risks**

11. In order to contribute effectively to DfT's wider policy on road safety DVLA has to rely, for the most part, on the accuracy of its records. Any potential impact upon the accuracy of the registers is given very careful consideration when new initiatives are proposed. In this review, in order to improve the accuracy of the records, consideration has been given to:

- providing for the renewal of the ten-year photocard driving licences and the recall of the paper driving licences free of charge. A fee for these transactions may discourage timely notification/amendment with a resultant detrimental effect on our record accuracy;
- the need to enable young drivers under the age of 21 to receive their provisional driving licences free of charge. This would be a major step towards removing any impediments to young drivers obtaining a first provisional licence and progressing through proper tuition/testing to a full driving licence.

12. There is a risk that the objective of improving the accuracy of the records will be jeopardised if the measures are not introduced. These policy aims will not be deliverable unless there is the re-allocation of the fee charges for other activities taking into account the overarching need to ensure a balance between costs and fees.

13. The provision of free upgrades from paper driving licences to the more secure photocard licences and free ten-yearly renewal of photocard licences will remove any financial obstacles in the way of drivers who need to inform the Agency of changes to their details. With the provision of free first provisional driving licences to those under 21, there is a positive incentive for new learner drivers to register accurately with the Agency and to follow the proper route to obtaining full entitlement to drive.

## **Financial Risks**

14. DVLA is progressing developments in electronic transaction handling and provision of services to its customers through e-channels. The fee cover for these changes was largely provided by the 2003 fee re-structuring.

15. The challenge facing the Agency now is the need to bring driver licensing in line with the format expected from the third European Directive. This will involve replacing the remaining paper driver licences. There is also the legal requirement to renew existing photocard licences at the end of their ten-year validity period.

16. The revision of the fee structure in these proposals aims to provide adequate cost coverage not only for the Agency's on-going operations, but also the new initiatives noted above. The revised fee structure will spread the cost burden across both current and proposed fee bearing activities and will therefore reduce the risk of income shortfalls due to over dependency on a single transaction activity.

## Options

17. The cost pressures arising from the need to renew the ten-yearly photocard licences and the replacement of paper driving licences with the more secure photocard licences mean that 'do nothing' is not an option. The effective "do nothing" option would be to set specific fees to cover costs for these activities whilst keeping all other fees at existing levels. The Agency is committed to these initiatives either through agreed policy, in the case of the ten-yearly renewal cycle, or through the need to comply with European legislation, in the case of the replacement of paper driving licences. Action has to be taken to ensure that the costs of these initiatives are covered. Based on our current estimate of the costs, fees of around £5 for the paper licence recall and £19 for the photocard renewals are indicated.

18. Renewal of ten-year photocard driving licences – Not Currently Applicable / £19. There is an option to charge a fee to cover the costs of the ten-yearly cycle of renewal of the existing photocard licences. The costs to be covered would be on going and have to absorb overheads on an ongoing basis. There may be an option to renew these photocard licences free of charge if a restructuring of current fees can cover costs. This would be similar to the situation with replacement driving licences, which are currently issued free of charge and would encourage more people to renew their licences at the end of the ten-year validity period. An indicative fee, if one were to be applied, would be around £19, in line with the current fee for a duplicate driving licence.

19. Recall of paper driving licences – Not Currently Applicable / £5. There would be additional costs associated with recalling paper driving licences. As this is essentially a one-off exercise any fee levied could be set at a level lower than that for the renewal of the ten-year photocard licences. An indicative range would be around £5. If a fee were not levied, then cost coverage would need to be found elsewhere from the flexibility allowed in our costs and fees pooling regime. The current arrangements on transfer from a paper licence to a photocard licence are to charge a fee of £19, unless this arises from the need to change details on the licence in which case the transfer is free. The intention is that the fee would be payable for all licences recalled, as those with a change of details already have a duty to have informed DVLA and would have been entitled to the free update.

20. Change of vehicle keeper – Free of charge / £7.50. This fee would be payable by the purchaser of a second-hand vehicle and paid over by the seller when he/she notifies DVLA of the change of keeper. It will be in the interest of sellers of vehicles to have the keeper details changed to those of the purchaser to comply with Continuous Registration requirements. The effect of not paying the fee would be that the change of keeper details were not effected and the liability of the seller for the vehicle and Vehicle Excise Duty payment under Continuous Registration would continue. There is also the option of charging no fee for this transaction if costs could be covered by fee income generated from other transactions in line with our pooling of costs. If a specific transaction fee were to be charged then this would be in the region of £7.50.

21. Annual vehicle registration – Free of charge / £2.50 - £4.50. In order to offset the funding shortfalls that would result from providing some of the initiatives noted above free of charge, we would introduce an Annual Registration fee. This fee would normally be collected alongside vehicle excise duty (VED). The result of this would be minimal (if any) further administration costs for the vehicle keeper. The payment of the fee would also be required for vehicles in respect of which the Statutory Off Road Notification (SORN) is declared, and for vehicles exempt from VED. This change would encourage vehicle keepers to update the registers in a timely manner. The likely fee would be in the range £2.50 to £4.50, depending on which of the other fees are subsumed into the annual fee.

22. Reduction in current vehicle first registration charge – reduced from £38 to £25-£30. The first registration fee was increased from £25 to £38 as part of the 2003 fee restructuring. As part of this further exercise we will revisit the level at which this fee is set. This will take into account a further assessment of representations received following the 2003 consultation exercise and also the share of funding support borne by all vehicle keepers. The reduced first registration fee could be anywhere in the range £25 to £30 depending on the exact levels of other fees in the pool.

23. Abolition of the provisional driving licence fee for those under 21 years old. The removal of this fee would remove any financial hindrance to young drivers to obtain their first provisional licences and in so doing having their details captured on our register. This contributes to greater road safety by encouraging these young people to progress through the tuition/testing route to obtain a full licence. New drivers currently pay £38 for their first provisional licence. We would continue to charge drivers of the age of 21 and over a fee for a first driving licence, although this would drop to around £30 and upgrades to full driving licences will continue to be free. Reissue after revocation would also drop from the current £38 to £30.

### Driver Fees

Transaction	Current Fee	Option 1 Fee	Option 2 Fee	Option 3 Fee	Option 4 Fee
<b>Driving Licence</b>					
First Provisional					
- Under 21 years old	£38	Free	Free	Free	Free
- Over 21 years old	£38	£30	£30	£30	£30
Upgrading after test pass	Free	Free	Free	Free	Free
Paper Licence Recall fee (new)	N/A	£5	£5	Free	Free
Ten-yearly Renewal of Photocard Licences (new)	N/A	£19	Free	Free	Free
Reissue after revocation	£38	£30	£30	£30	£30

### Vehicle Fees

Transaction	Current Fee	Option 1 Fee	Option 2 Fee	Option 3 Fee	Option 4 Fee
Initial Vehicle Registration	£38	£30	£25	£28	£28
Annual Registration Fee (new)	N/A	Free	£2.50	£3	£4.50
Change of Keeper Fee (new)	N/A	£7.50	£7.50	£7.50	Free

24. Option 4, in the table above, is the one preferred by DVLA because it is administratively simpler, reduces costs, provides easier service for the customers and secures all of the policy benefits sought.

## Costs and Benefits

### Business Sectors Affected

25. All sectors of business that register new vehicles with the registration authorities (DVLA and DVLNI) will be affected. It is our assumption that as the change in vehicle first registration fee is small in relation to the overall cost of new vehicles, there will be no tangible impact on vehicle manufacturers and retailers. The proposed reallocation of the funding stream from a first registration charge alone to a reduced first registration charge together with a new annual registration charge, will have greater impact on four main areas of business:

- Car and light goods fleet operators and business car users (48% of new registrations)
- Commercial goods vehicle operators (1.8% of new registrations)
- Agricultural industry (0.5% of new registrations)
- Bus companies (0.4% of new registrations)

26. Our initial analysis shows that there is likely to be an overall beneficial effect to business in the region of £1m per annum in reduced fees cost, although this will affect various sectors of business in different ways. We will continue through dialogue with business sectors during the course of the consultation to refine our understanding of the exact impact these proposals may have on businesses.

27. It is the assumption in this proposal that driving licence fees are a matter for individual drivers. We do acknowledge that some organisations choose to pay their drivers fees but, in the overall context of this consultation, the effects on the various business sectors will be negligible.

### Assumptions

28. All of the options in this proposal have been framed to deliver the same cost cover for the new initiatives of replacing paper driving licences, recalling ten-year photocard licences and providing free provisional licences for

drivers under 21 years old. The financial model used to compare income with costs contain the following main assumptions about the volume of transactions that DVLA will process annually:

- First Provisional Driving Licences – under 21 years old 768,000
- First Provisional Driving Licences – 21 years old and over 192,000
- First Vehicle Registrations 3,220,000
- Annual Vehicle Registrations (inc. SORN) 34,461,000
- Annual Change of Keeper Transactions 0
- Paper licence recalls (per annum over 2 years) 6,000,000
- Photocard renewals (average over 10-year cycle) 3,300,000

29. The intention for the fees restructuring is purely to cover the anticipated costs of the changes indicated in this document. These have been estimated to be between £75m and £95m, but will be calculated far more accurately closer to the date at which the new fee levels are to be set. The precise levels of the fees to be set, depending on the chosen option, informed by this consultation, will be the subject of a further detailed consultation. In order to provide an approximation of the impacts, indicative fee levels have been used in this consultation that provide cost coverage within the range of costs estimated.

30. The overall impact of the indicative costs calculated for the forecast transaction volumes above are included in the options analysis that follows. Whilst the total impacts do vary, this is because we have kept our indicative fees at simple (rounded) financial sums. The intention is to recalculate the precise fee levels required based on updated cost and volume forecasts prior to the final consultation.

## Benefits

### OPTION 1

31. The main beneficiaries under this option each year will be the three quarters of a million young persons under 21 years of age who will be able to apply for a first provisional licence free of charge, the two hundred thousand persons 21 and over who will pay a reduced fee for their provisional driving licence and purchasers of new vehicles who will pay the reduced first registration fee. The combined benefit to each of these groups is assessed on an annual basis as £29.2m for drivers under 21, £1.5m to drivers 21 and over and £24m for first registered keepers of vehicles. This option should assist in delivering policy aims of maintaining accurate drivers' registers by ensuring that there are no financial obstacles to young learner drivers entering our registers.

### OPTION 2

32. The net benefit to drivers, £29.2m to drivers under 21 and £1.5m to other drivers, is the same for all options. All purchasers of new vehicles would benefit from the reduction in first registration fees- the combined benefit is around £39m.

### OPTION 3

33. Drivers benefit to the extent already noted in the previous options. The combined benefit to purchasers of new vehicles under this option will be £30m.

### OPTION 4

34. Drivers benefit to the extent already noted in the previous options. The combined benefit to purchasers on new vehicles will be £30m.

## Costs

### OPTION 1

35. The main policy costs that arise from this option are in respect of the imminent need to start the ten-year renewal cycle of the photocard licences and the recall of paper driving licences to be replaced by smartcard licences arising from the Third European Directive. The two initiatives will increase the costs for drivers by £92.7m.

36. The introduction of the Change of Keeper fee will increase the costs to those who purchase second hand vehicles. Each year there is estimated to be 6m such transactions resulting in a combined cost to vehicle keepers of £45m.

37. Under the assumptions stated in paragraphs 28 to 30, the total net funding produced (i.e. increased fees net of reduced or abolished fees) is £82.9m. This is within the anticipated additional costs envelope.

### OPTION 2

38. Under this option, the costs to drivers overall comes down from £92.7m to £30m due to photocard renewals now being given free of charge.

39. The costs to those who purchase second hand vehicles and who will pay the Change of Keeper fee will remain at £45m, the same as it is in Option 1.

40. The introduction of a vehicle annual registration fee will cost keepers of vehicles a combined £86.1m.

41. Under the assumptions stated in paragraphs 28 to 30, the total net funding produced (i.e. increased fees net of reduced or abolished fees) is £91.4m. This is within the anticipated additional costs envelope.

### **OPTION 3**

42. The paper licences recall exercise and the ten-yearly renewal of photocard licences will be provided free of charge to drivers under this option.

43. The Change of Keeper fee will impose an overall cost on purchasers of second-hand vehicles of £45m as it does in the previous two options.

44. Under this option the vehicle annual registration fee, which is now set at £3, imposes an overall cost of £103.4m on vehicle keepers.

45. Under the assumptions stated in paragraphs 28 to 30, the total net funding produced (i.e. increased fees net of reduced or abolished fees) is £87.6m. This is within the anticipated additional costs envelope.

### **OPTION 4**

46. As the fees for paper licence renewal, recall of ten-year photocard licences and Change of Keeper are not covered by this option, the only cost will be to keepers of vehicles arising from the annual registration charge. At the level of £4.50, this will amount to around £155.1m in total.

47. Under the assumptions stated in paragraphs 28 to 30, the total net funding produced (i.e. increased fees net of reduced or abolished fees) is £94.3m. This is within the anticipated additional costs envelope.

## **Equity and Fairness**

48. These proposed amendments to the fee structure take forward the re-structuring of DVLA's fee charging regime that began with the 2003 fee changes. The amendments continue with the principle of fair and equitable distribution of costs and seek to cover costs in the fairest way possible whilst ensuring that changes in fees do not impede policy delivery.

### **OPTION 1**

49. The main group to benefit from this option will be new applicants, under the age of 21, for provisional driving licences who will now get them free of charge as well as those 21 and over who will now pay a reduced fee. Purchasers of new vehicles will also benefit from the reduction in vehicle first registration fee. The holders of paper licences will need to pay a fee of £5 to have their licences replaced by smarter card licences when the recall exercise is undertaken and drivers will also pay £19 to have their photocard licences renewed at the end of the ten year validity period. The introduction of a change of keeper fee will affect about six million purchasers of second-hand vehicles every year.

### **OPTION 2**

50. The applicants for first provisional driving licences will again benefit under this option. In comparison to the first option, the ten-yearly renewal of photocard licences will now be free of charge. Purchasers of new vehicles will be favoured by this option, as the first registration fee will be reduced to the level it was when it was introduced in 1998. All keepers of vehicles will be affected in that they will now be required to pay an annual registration fee of £2.50. The purchasers of second hand vehicles will be affected to the same extent as in the first option.

### **OPTION 3**

51. All drivers are favoured under this option as, in addition to first provisional licences being free to under 21 year olds, the renewal/replacement of driving licences (other than those following revocation or disqualification) will also be free of charge. Purchasers of new vehicles will benefit from the reduction in first registration fee, although to a lesser extent than in the previous option. All keepers of vehicles will be affected in that they will now be required to pay an annual registration fee of £3. The purchasers of second hand vehicles will be affected to the same extent as in the first two options.

### **OPTION 4**

52. The benefit to drivers remains the same as in the previous option. The difference in this option is that purchasers of second-hand vehicles are no longer affected by the change of keeper fee, which is dropped from this option. Keepers of vehicles will now have to pay an annual registration charge of £4.50 whilst the reduction in first registration charge to £28 will benefit purchasers of new vehicles, though not to the same extent as in the previous two options.

## **Small Firms' Impact Test**

53. The Agency believes that the overall impact of the proposed change to the vehicle registration fee structure on small businesses will be low. The proposed annual registration fee of £4.50 taken into context is a very small cost to business. It is not anticipated that this fee will affect competition or mean that businesses will no longer be able to continue as going concerns.

54. Impact will be greatest on businesses that do not purchase brand new vehicles. In these cases businesses will pay the proposed £4.50 per annum fee but will not benefit from the proposed reduction in the 'first registration' fee.

55. Additionally the Agency estimates that any additional administrative burden arising from the proposed new annual registration fee will be minimal. It is proposed that the annual fee be paid at the same time as the annual/six-monthly payment of Vehicle Excise Duty.

56. Currently the Agency is working alongside the Small Business Service of the Department for Trade and Industry in attempting to gauge the views of various business support organisations, which represent each of the business sectors affected, in respect of these proposed changes.

## **Competition Assessment**

57. The fleet, leasing, bus and haulage markets are all broad-based with no one firm or small group of firms, holding a pronounced market share. Within each of these sectors, no firm would be affected to any greater degree than any of its competitors of comparable size. The costs would fall in direct relation to the size of the business.

## **Enforcement and Sanctions**

58. There will be no enforcement implications or sanctions as a result of the implementation of these proposals.

## **Monitoring and Review**

59. DVLA monitors its own financial position continuously. Its fee structures are formally reviewed on an annual basis. Interested parties are consulted as part of this review process.

## **Summary**

60. DVLA wishes to amend its fee structure to continue the restructuring begun in 2003. The fees must be set so as to continue to meet the objective of recovering the costs of DVLA's activities. However, the setting of an appropriate fee structure will support DVLA's policy objectives e.g. accuracy of its driver and vehicle records will aid better enforcement from the record and contribute to greater road safety. Four alternative fee structures have been identified.

# **Annex C**

## **List of Consultees**

3Ms

Age Concern Cymru

Age Concern England

Age Concern Scotland

Alliance of Small Firms & Self Employed People

Amateur Motor Cycle Association Ltd

Ambulance Service Association

Ambulance Service Institution

Approved Driving Instructors

Approved Driving Instructors of Scotland

Association of British Chambers of Commerce

Association of British Drivers

Association of Car Fleet Operators

Association of Chief Police Officers Scotland

Association of Independent Road Safety Officers

Association of Loading & Elevation Equipment Manufacturers

Association of Local Bus Managers

Association of Local Governments

Association of London Authorities

Association of London Boroughs Road Safety Officers

Association of London Government

Association of National MOT Testers

British Safety Council

British School of Motoring

BSI (Project Manager)

BT Safety Unit

Building Employers Federation

Building Merchants Federation

Bus & Coach Council

Business in the Community

Campaign Against Drink Driving

Campaign for Homosexual Equality

CBI

CBI Scotland

CBI Wales

Central Scotland Roads AIU

Chairman Transport Committee

Cherished Number Dealers Association

Citizens Advice (Scotland)

Civil Service Motoring Association

Civil Service Pensioners Alliance

Commercial Motor Magazine

Commission for Racial Equality

Community Development Foundation

Association of Retired and Persons Over 50  
Association of Street Lighting Engineers  
Association of Tanker Container Operators  
Association of Vehicle Recovery Operators  
Arthritis Care  
Auto Economics Salvage  
Benefits Agency  
BMI Health Services Ltd  
Bradford Transport Training  
BRAKE  
British Association for Service to the Elderly  
British Association of Amusement Catering  
British Association of Removers  
British Chambers of Commerce  
British Deaf Association  
British Historical Vehicle Club Federation  
British Institution of Traffic & Education Research  
British Numberplate Manufacturers Association  
  
Department of Education and Skills  
Department of Health  
Department of International Development  
Department of Trade and Industry  
Department of Work and Pensions  
Direct Line Group  
DPTAC  
Drivers Action Movement  
Driving Instructors Association  
Driving Instructors Scottish Council  
DVLNI  
DVO Group  
e-Government Unit  
Environmental Transport Association  
Equal Opportunities Commission  
European Secure Vehicle Alliance  
Exel Ltd  
Federation of British Historic Vehicle Clubs  
Federation of Manufacturers  
Federation of Public Passenger Transport Employers  
Federation of Small Businesses  
Film & TV Lighting Contractors  
Fire Brigades Union  
Fire Fighting Vehicles Manufacturers Association  
Fire Services Unit  
First European Numberplates (UK) Ltd  
Fleet & Leasing Association  
Foreign & Commonwealth Office

Community Transport Association  
Confederation of British Road Passenger Transport UK  
Confederation of Passenger Transport UK  
Construction Plant Hire Association  
Consumer Congress  
Consumer's Association  
Contractors & Mechanical Plant Engineers  
Convention of Scottish Local Authorities  
Co-operative UK  
Countryside Agency  
County Road Safety Officers Association  
County Trading Standards  
Credit Industry Fraud Avoidance System  
Croners Coach and Bus Operators  
Dairy Trade Federation  
Dale Farm Dairy Group  
Department for Transport  
Department of Culture, Media and Sport  
  
INF  
Information Commissioner  
Inland Revenue  
Innovative Training Concepts  
Institute of Advanced Motorists  
Institute of Directors  
Institute of HGV Driving Instructors  
Institute of Race Relations  
Institute of Registration Agents and Dealers (MIRAD)  
Institute of Road Safety Officers  
Institute of Road Transport Engineers  
Institute of Transport Administration  
Institution of Highways & Transportation  
Institution of Municipal Transport  
Institution of Trading Standards  
International Powered Access Federation  
Joint Committee on Mobility for the Disabled  
Justices' Clerks' Society Wrexham  
Keep Deaths Off Our Roads  
LACORS  
LIBERTY  
Lifting Equipment Engineers Association  
Local Authority Road Safety Officers Association  
Local Government Association  
Local Government Information Unit  
London Association of Independent Businesses  
MD Autoglass  
Ministry of Agriculture

Forum of Private Businesses  
 General Consumer Council for NI  
 Glass' Information Services Ltd  
 Green Flag Motoring Assistance  
 Guild of Experienced Motorists  
 Halfords Ltd  
 Health & Safety Commission  
 Health & Safety Executive  
 Heavy Transport Association  
 Historic Commercial Vehicle Society  
 HM Customs & Excise  
 HM Treasury  
 Home Office  
 National Association of Funeral Directors  
 National Association of Local Government Officers  
 National Association of Street Clubs  
 National Association of Vintage Tractor  
 & Engine Club Archivists  
 National Association of Waste Disposal Contractors  
 National Chamber of Commerce and Industry  
 National Consumer Council  
 National Consumer Federation  
 National Council on Inland Transport  
 National Federation of Post Office and BT Pensioners  
 National Federation of Self Employed Business  
 National Freight Consortium (Now Exel)  
 National Guild of American Vehicle Clubs & Traders  
 National Joint Committee for Young HGV Drivers  
 National Outdoor Events Association  
 National Owner Drivers Association UK  
 National Pensioners Convention  
 National Playbus Association  
 National Salvage Group Ltd  
 National Street Rod Association  
 National Union of General & Municipal Workers  
 National Union of Road Transport Operatives  
  
 Nationwide Auto Salvage Amalgamation  
 Newport Transport Ltd  
 NHS Supplies  
 North East Vocational  
 North Lancs Training School  
 Northern Ireland Office  
 Norwich Union  
 Office of Fair Trading  
 Office of Paymaster General  
 Police Federation of England and Wales  
 Police Science & Technology

Ministry of Defence  
 Motability  
 Motor Insurers Bureau  
 Motor Schools Association of GB Ltd  
 Motor Vehicle Dismantlers Association of GB  
 Motor Vehicles Repairers Association  
 National Advisory Unit for Community Transport  
 National Alliance of Womens Organisations  
 National Association of Agricultural Contractors  
 National Association of Citizens Advice Bureaux  
 National Association of Driving Instructors  
  
 Road Safety Council in Wales  
 Road Safety Markings Association  
 Road Transport (Industry)  
 Road Transport Association  
  
 Royal National Institute for Deaf People  
 Royal Scottish Automobile Club(Motor Sport) Ltd  
 Royal Society for the Prevention of Accidents  
 Safety Standards Commission Institute  
 Scotland Office  
 Scottish Consumer Council  
 Scottish Executive Development Dept  
 Showman's Guild of Great Britain  
 Society of Allied & Independent Funeral Directors  
 Society of Independent Roundabout Proprietors  
 Society of Motor Auctions  
 St Ivel Westway Ltd  
 St John's Ambulance  
 Standing Conference of Fixed Penalty Clerks  
 Sun Alliance  
 TGWU  
 The Approved Driving Instructors  
 The British Agricultural & Garden Machinery  
 Association  
 The British Ambulance Association  
 The British Chambers of Commerce  
 The British Motorcyclists Federation  
 The British Retailers Consortium  
 The British Road Federation  
 The Camping and Caravanning Club  
 The Caravan Club  
 The Chartered Institute of Logistics & Transport  
 The Chief and Assistant Chief Fire Officers Association  
 The Coach Operators Federation  
 The Disabled Drivers Association

Police Service NI  
Post Office Ltd  
RADAR  
Register of Private Ambulances  
Retired Persons Action Group  
Road Haulage & Distribution  
Road Rescue Recovery Association  
The Motorcycle Action Group  
The National Council for Voluntary Organisations  
The Trading Standards Institute  
The Transport Association  
The Vintage Motorcycle Club Ltd  
Trade Union Congress  
Transport 2000  
Transport Policy Division  
Transport Registration Branch  
Transport Research Laboratory  
Transport Week Magazine  
Truck & Driver  
Union of Independent Companies  
UNISON Convenor  
United Road Transport Union  
Universal Salvage  
Vehicle Certification Agency  
Vehicle Industry Consultants  
Veteran Car Club  
Wales Community Transport  
Wales Community Transport Consultative Committee  
Water Jetting Association  
Welsh Consumer Council  
Welsh Counties Committee  
Welsh Local Government Association  
Welsh Office  
Welsh Office Library

#### **Industry Liaison Group Members**

Agricultural Engineers Association  
Association of British Insurers  
Automobile Association  
British Car Auctions Ltd  
British Industry Motor Trade Association  
British Vehicle Rental and Leasing Association  
British Vehicle Salvage Federation  
Department for Transport  
Finance & Leasing Association  
Fleet Audits Ltd  
Freight Transport Association

The Disabled Drivers Motor Club  
The Disabled Motorists Federation  
The Environment Agency  
The Federation of British Vehicles Club  
The Jill Dando Institute of Crime Science

#### **Consumer Liaison Group**

City and Council of Swansea  
RAC Foundation  
RAC Motoring Services  
Race Equality  
Trading Standards

#### **Police Liaison Group**

Association of Chief Police Officers  
Avon and Somerset Police  
Derbyshire Constabulary

Green Flag Motoring Assistance  
Manheim Auctions  
Motorcycle Industry Federation Ltd  
National Farmers Union  
Retail Motor Industry Federation  
Scottish Motor Trade Association  
Society of Motor Manufacturers & Traders  
The Association of British Drivers  
The Road Haulage Association Ltd  
Vehicle Builders & Repairers Association

### **Courts Liaison Group**

Barnstaple Magistrates Court  
Courts Service HQ  
Crown Office  
Crown Prosecution Service  
Department for Constitutional Affairs  
District Courts Association  
District Judges (Magistrates Court)  
Driving Standards Agency  
Justices' Clerks' Society  
MCC Management & Training Centre  
Newcastle Magistrates Court  
Scottish Courts Service  
Scottish Executive  
Scottish Executive (Justice Department)  
The Districts Courts Association  
The Magistrates Association  
The Magistrates Association  
Vehicle and Operator Services Agency

### **Northern Ireland Consultees**

Antrim Borough Council  
Ards Borough Council  
Armagh City & District Council  
Association of Local Authorities NI  
Ballymena Borough Council  
Ballymoney Borough Council  
Banbridge Borough Council  
Belfast City Council  
Belfast Education & Library Board  
Belfast Solicitors Association  
British Motorcyclists Federation  
Campaign Against Drink Driving

Durham Constabulary  
Home Office  
Home Office  
Lancashire Constabulary  
Metropolitan Police  
Metropolitan Police  
National Criminal Intelligence Service  
Norfolk Constabulary  
Police Information Technology Organisation  
South Wales Police  
Staffordshire Police  
Strathclyde Police  
Tayside Police

Larne Borough Council  
Law Reform Committee  
Limavady Borough Council  
Lisburn City Council  
Magherafelt District Council  
Management Institute  
Motorcycling Union of Ireland (MCUI)  
Motorcyclist Action Group  
Moyle District Council  
Newry & Mourne District Council  
Newtonabbey Borough Council  
NI Association of Citizens Advice Bureaux  
NI Chamber of Commerce and Industry  
NI Chamber of Trade

Carrickfergus Borough Council	NI Committee of the Irish Congress of Trade Unions
Castlereagh Borough Council	NI Court Service
Child Accident Prevention Trust	NI Human Rights Commission
Christian Road Safety League	NI Private Coach Operators Association
Clerk of Petty Sessions	NI Resident Magistrates Association
Coleraine Borough Council	NI Rider Training Scheme
Cookstown District Council	NI Transport Holding Co. Ltd
Council of HM County Court Judges in NI	NISPA
Craigavon Borough Council	North Down Borough Council
Department of Enterprise, Trade and Investment	North Eastern Education & Library Board
Department of Regional Development	Northern Ireland Council on Disability
Derry City Council	Northern Ireland Office
Disability Action	Office of the Director of Public Prosecutions
Disabled Drivers Association NI	Omagh District Council
DOE (NI)	Pedestrian Association
Down District Council	Police Federation for Northern Ireland
Dungannon District Council	Road Safety Council of NI
DVLNI	RoSPA (NI)
Equality Commission for NI	Rural Community Network
Equality Forum NI	South Eastern Education & Library Board
Federation of Small Businesses	Southern Education & Library Board
Fermanagh District Council	Strabane District Council
Fire Authority of NI	The Bar Council
General Consumer Council for NI	The Law Society of NI
Health Promotion Agency for NI	Translink
Institute of Directors	Transport Registration Branch
	Western Education & Library Board

## **Annex D**

### **Code Of Practice On Written Consultation**

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information about the Code of Practice is available at the Cabinet Office website:  
[www.cabinet-office.gov.uk/regulation/consultation/code.htm](http://www.cabinet-office.gov.uk/regulation/consultation/code.htm)