

Select Committee on Environment, Transport and Regional Affairs

Inquiry into the administration and expenditure of those Executive Agencies of the Department of the Environment, Transport and the Regions which relate to transport.



Memorandum from:

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1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) is pleased to respond to the invitation from The Transport Sub-committee of the Environment, Transport and Regional Affairs Select Committee to provide comments for the inquiry into the administration and expenditure of those Executive Agencies of the Department of the Environment, Transport and the Regions which relate to transport.
- 1.2 The MSA is the national trade association for driving instructors and schools founded in 1935. Members of the association are in the main Driving Standards Agency Approved Driving Instructors (ADI) following our merger with the Institute of Large Goods Vehicle Driving Instructors (ILGVDI), earlier this year, we also represent their interests together with those of a small number of bus/coach instructors and motorcycle instructors.

2 GENERAL COMMENTS

- 2.1 We have been asked to give our views on the parts of the enquiry relevant to the association, particularly the Driving Standards Agency (DSA). However, under section 15 we make some brief points about the work carried out by the Vehicle Inspectorate.

2.2 In order to collect as wide a range of views as possible before submitting the association's views to the committee, we have invited all MSA members to contribute, in writing, details of their best and worst experiences with the DSA over the past twelve months. Members of the association's Board of Management have also consulted members through regional meetings and the association's network of branches and associated local ADI groups. (Throughout this submission we have placed edited quotes "*in italics*" that we have received from MSA members. Where they have requested anonymity, we have given only their general location. We have reproduced only a representative sample of the material received)

3 DSA AT ITS BEST

3.1 Almost without exception, the views we have received from members about their best experiences of dealing with the DSA concern the co-operative and friendly attitude displayed by all levels of staff within the DSA. In particular they stressed the helpful attitude displayed by staff at the practical driving test booking call centre. The ADI section based at the DSA HQ in Nottingham and by examining staff at all levels.

3.1.1 "*Booking staff always cheerful and helpful in the face of farcical new computer system.* Jane Simpson, Wickham Market.

3.1.2 "*When I was going through the qualifying process to become an ADI I was beset by all sorts of problems in my personal life and in my relationship with my trainer. The ADI section was always helpful, compassionate and efficient.*" ADI Greater Manchester

3.1.3 "*Examiners at Sevenoaks and Tunbridge Wells very helpful, courteous and considerate. They do an excellent job of assuring nervous pupils*" Michael Bassett, Tunbridge Wells.

3.1.4 "*I was impressed by the speed that DSAs Technical Standards Branch responded to queries about the use of an unsuitable road on a driving test route*" John Lomas, Blackburn.

4 TELEPHONE CALLS TO DSA CALL CENTRES

4.1 In order to book a practical or theoretical driving test by telephone, callers have to ring one national telephone number. We recently carried out a mystery shopper exercise on the DSA booking system and wanted to make fifteen calls to the national number.

4.2 According to DSA service standards - 95% of calls to booking offices will access the call handling system without receiving an engaged tone. We did not receive the engaged tone once whilst carrying out this exercise. However, on two occasions we received BT announcements and failed to make a connection and on a further three occasions we were cut off whilst connected to the DSA call handling system and before we could speak to an operator.

4.3 The DSA therefore fulfilled their service standard of 95% of calls connected without receiving an engaged tone. However, we were only successful in reaching an operator with 75% of our calls!

4.4 The length of time taken to navigate through the call handling system to reach an operator is, we believe, unacceptable. The average time of five attempts to contact a theory test booking clerk was 1 minute 19 seconds. Whilst there is a fast track route through the call handling system it often does not work properly and it is easy to press one wrong number and have to redial.

4.4.1 "*Could not DSA have their telephones answered by a human being?* ADI South Staffordshire

4.5 Because of difficulties with the DSA computer system, discussed below, some members have experienced extremely long telephone calls with the DSA booking service, this involves very high telephone charges because the DSA booking number is an 0870 telephone number. This means that all calls are charged at national rate and the DSA receive a commission on call

charges. It is therefore in the financial interest of DSA to extend the length of calls in order to increase their revenue.

4.6 The MSA objected to this system when it was introduced and continues to be against it. We believe that the booking service should be contacted by an 0800 freephone number or at the least by a 0345 local rate number. We believe this might encourage the DSA to improve their response speeds and at the least would stop them profiting from their own inefficiency.

4.7 **We request the select committee to recommend the scrapping of the national number for driving test bookings. Replacement of that number with separate 0800 freephone numbers for theory and practical test bookings. Together with the replacement of the call handling system with a human response system.**

5 FACSIMILE TRANSMISSIONS TO DSA CALL CENTRES

5.1 The DSA also run a fax application service, the number is of course a profit making 0870 number. However, it seems that even this piece of technology defeats them as shown in this letter sent by an ADI to DSA Customer Services at Newcastle in July. To date the writer has not received an acknowledgement or a reply.

5.1.1 *Please find enclosed a fax journal as proof of a fax transmission sent to your booking office on 12/7/00.*

This is the third fax I have sent this year, which the bookings office has no record of receiving. I have on each occasion had to call the bookings to confirm receipt and had to be put through to a supervisor who demanded proof of the fax. Each time I do this, it costs me time and money. The last call on 17th July lasted 15 minutes at peak rate costs.

I would like you to investigate why it is possible for a fax confirmed as sent not be received by you. I and many other ADIs have little faith in this system; there is no point in sending a fax if your office denies receipt. I also have little time to hang on the phone waiting for an answer. It is to both our benefits that the fax application system is working efficiently and I can think of no reason why this should not be.

Please confirm receipt of this letter and advise me of what action you intend to take to ensure this does not happen again. Jamie Waddell, Exmouth

5.2 **We request the select committee to recommend the scrapping of the national number for driving test bookings by facsimile transmission. Replacement of that number with a 0800 free phone number. Further, to recommend that DSA instigate an efficient fax handling service.**

6 DSA DRIVING TEST BOOKING SYSTEM

6.1 The DSA prior to the launch of their new Driving Test Control System in 1999, (it was due to have been launched in 1998,) made much of the benefits that it would bring in increased efficiency, improved call times and better deployment of staff. It is unlikely that any organisation has ever been proved more wrong in their pre-launch statements.

6.2 We offer some extracts from DSA Press Release 54/97 issued 26 September 1997 and titled DRIVING TEST ADMINISTRATION GOES HIGH TECH along with comments received from MSA members

6.3 “~ a new practical driving test booking system which will offer a range of better service facilities for customers”. One of the “better service facilities” was supposed to be an ability to prevent the situation where an ADI had two pupils booked at the same time. As this extract from a letter to the DSA Chief Executive sent on 26 September 2000 shows this is clearly not the case.

6.3.1 *Re: Driving Test Booking System and the case of Mrs R.*

Mrs R passed her theory test, and having done so was given a practical driving test application form. Without reference to me she telephoned and booked a practical test. Because

she had not spoken to me first she did not give the booking clerk my ADI number which could (maybe) prevent a double booking problem. In order that a double booking could not arise, I telephoned the booking section to insert my ADI number into her application. However, I was told that although the computer would accept my ADI number on her application, it would make no difference to the double booking problem.

I find it inconceivable that the DSA has a system that will not accept such a procedure. I would have thought that this would have been one of the functions that would have received priority when the computer system was being designed.

This system means that an ADI who inherits a pupil who has already booked a practical test with another ADI, cannot have that test date protected by the system which should prevent double booking.

I look forward to hearing your views on this matter. Rod Came, East Grinstead – As at 6 November 2000 Mr Came had not received a reply to his letter.

6.4 It might be thought that another of the “better service facilities” would be a proper back up system in case of problems. This following comment would suggest that this is clearly not the case.

6.4.1 *It appears that on 11 July the Test Booking Computer ‘crashed’ so that all the applications processed on that day were lost.*

It was not until 3 weeks later that I became aware of this. A pupil wanted to change her driving test appointment only to discover that there was no record of the date. There was however, an entry showing that there had been an attempt to book a test.

I am now aware of 12 similar cases. These tests were re-booked for dates 11 to 12 weeks after the original application.

When I telephoned, the customer services section, after some tests had been rebooked, they claimed to be unaware of the situation.

This situation led to a disruption for candidates planning up to their driving tests. Colin Lilly, Weston-super-Mare.

6.5 "The new system should result in a great improvement in the service we can offer our practical test customers when they contact any of our booking offices to arrange a test," said DSA Chief Executive Bernard Herdan. "Due to be operational by late 1998 customer calls will be shorter, so reducing their phone bills." One could reasonably assume that “a great improvement in the service” might include an efficient method of passing information from the booking centre to the local Driving Test Centre. As this report from a driving instructor shows this is clearly not the case.

6.5.1 *My pupil applied for her practical test, telling the booking clerk about her problem with dyslexia. I also informed the senior examiner at the local centre, he said he would be informed officially beforehand.*

The day of the test came, her examiner knew nothing about giving her hand directions as the senior examiner had indicated would happen. My pupil, who could not tell left from right, failed. A week later the senior examiner spoke to me and said that he was off work ill and the examiner had not been informed of her special needs. ADI, Leicestershire.

6.6 It might also be the case that “a great improvement in the service” might meant that system would not book more tests than there were appointments available. As this report from a driving instructor shows this is also clearly not the case.

6.6.1 *My worst experience with the DSA in the last twelve months has been when a candidate had a test booking for an A.M. test to be telephoned on the morning of the test by someone at the Newcastle booking office to say that the test had been cancelled because their was an examiner ill.*

This was one and a half-hours before the test was due. On investigation at the test centre it transpired that it was an overbooking problem not an examiner ill.

Then no test was available until three weeks later. The parent of the candidate who was extremely annoyed, spoke to the Newcastle office, and managed to rebook the test for two days later but only after creating a stink! Karl Satloka, Cleckheaton.

6.7 The Technical specifications that were attached to the press release stated – “The system will be configured ready for connection to the Internet.” Two years later still no sign of an interactive on line booking service and DSA best estimates suggest it could be another two years before this service is available. Whilst we are unsure of the demand we do not think it unreasonable in the 21st Century for the DSA to be able to accept test bookings by E-mail. It would certainly be a cheaper alternative to those currently available.

6.8 We request the select committee to recommend the introduction of an E-mail booking service immediately. Further that the DSA explain exactly what their computer booking system can and cannot do and what their programme is for getting it right.

7 PRACTICAL DRIVING TEST WAITING TIMES

7.1 The DSA Service Standards for practical driving test waiting times revolve around average waiting times for tests across the country. Whilst it is obviously important that waiting times should be kept to a reasonable level we feel that there should also be some consistency in the waiting times across the country. Waiting time figures published by the DSA show for the third week in November 2000 that the test centre waiting times range from one week to fourteen weeks.

7.2 The DSA seem unable to deploy staff in a way that equalises the waiting times across the country, the chart below shows a small selection of centres all with about thirty minutes driving time between them but vastly differing waiting times.

| Centre | Waiting time | Centre | Waiting time | Difference | Travelling Time |
|--------------------|--------------|--------------------------|--------------|------------|-----------------|
| Ashford Kent | 4 weeks | Gillingham Kent | 8 weeks | 4 weeks | 32 minutes |
| Brentwood Essex | 9 weeks | Barking | 13 weeks | 4 weeks | 30 minutes |
| Crewe Cheshire | 4 weeks | Cobridge, Stoke on Trent | 8 weeks | 4 weeks | 24 minutes |
| Preston Lancashire | 5 weeks | Blackburn Lancashire | 9 weeks | 4 weeks | 21 minutes |

7.3 *The experience of trying to book is still you may get through or you may not and when you do get through you might get a test in a week or it could be two months. I find it very hard to judge when to put someone in for his or her practical test.* ADI, Northamptonshire

7.4 The DSA tend to respond to criticism about long waiting times at certain centres by suggesting that candidates travel to a centre with a shorter waiting time. We believe that as a monopoly service provider the DSA should ensure the correct level of staff at each centre in order to ensure consistent waiting times rather than asking their customers to fit in with their staff deployment plans.

7.5 We request the select committee to recommend the introduction of a DSA service standard that concentrates on across the board consistency in practical driving test waiting times rather than average waiting times.

8 DRIVING TEST CENTRE CLOSURES

- 8.1 Over the last ten years, the DSA has embarked upon a programme of driving test centre closures. Whilst some of these may have been necessary because of a lack of suitable driving test routes others have been closed in order to save relatively small amounts of money.
- 8.2 In most cases when a centre is threatened with closure local instructors, members of the public, local councillors and MPs object because they see it as a diminution of a local service. On a number of occasions, quite bitter battles have taken place between the DSA and local communities. In our view the amount of resources expended by the DSA in promoting these closures probably uses up any saving made if the centre is eventually closed.
- 8.3 There is also an inconsistency in the criteria for closing centres as they are not closed solely on the business case put forward by the DSA. Each closure has to be ratified by a government Minister and it has been suggested to us that whether or not a centre closes depends on the profile of the MP in whose constituency the centre is located.
- 8.4 A number of centres are currently being considered for closure, DSA Press Release 34/00 issued 14 November 2000 states "The Macclesfield Driving Test Centre will temporarily close for business on 30 November 2000, due to the lease expiring on the property". DSA have assured us that this is only a temporary closure and that they are looking to secure new premises in Macclesfield at the earliest opportunity. However, it is worth noting that DSA said Crosby test centre was only going to be closed temporarily in 1998 but it has never re-opened.
- 8.5 We request the select committee to recommend the immediate end of the driving test centre closure programme and that in future centres should only be closed where routes become unsuitable or a majority of local driving instructors agree with the closure.**

9 DRIVING TEST CENTRE RE-LOCATIONS

- 9.1 The physical condition of many driving test centres is poor both from the customer's perspective and from the examiner point of view. Instead of closing centres the DSA should be renovating and modernising the existing estate. It is somewhat shocking to realise that many driving test centres do not have toilet facilities available for candidates.
- 9.2 We request the select committee to recommend an improvement programme for DSA test centres targeting the provision of toilet facilities for candidates at every test centre by 2002.**

10 DRIVING TEST PASS RATES

- 10.1 Much comment is made about pass rates on driving tests, the figures for the year ended March 2000 show a national pass rate of 43.7% this represents the number of tests passed against the number of tests taken. The DSA do not collate statistics on first time, second time etc. pass rates which would be a much more realistic measure of the test readiness of candidates presented.
- 10.2 We request the select committee to recommend that DSA commence collection and collation of first time pass rates forthwith.**
- 10.3 The figure 43.7% is the one often discussed and against which individual driving instructors are often judged. However, it is only a national average figure and little comment is ever made of the huge variations in pass rates across the country.
- 10.4 For the same period the test centres in Leeds and at Wood Green in London shared the distinction of the lowest pass rate in Britain at 28% whilst top spot went to the occasional

centre at Kingussie in Scotland where the pass rate was 79.2%. A pass rate difference of 51.2%.

10.5 This difference can be explained in part by differences between those likely to come forward for testing in an inner city area as against those in a extremely rural area where the number of tests taken are much lower. However, other variations whilst less dramatic are more difficult to understand.

10.6 Comparison of the pass rates at the test centres highlighted above that are within thirty minutes of each other show the following differences.

| Centre | Pass Rate | Centre | Pass Rate | Difference |
|--------------------|-----------|-------------------------|-----------|------------|
| Ashford Kent | 51.2% | Gillingham Kent | 40.5% | 10.7% |
| Brentwood Essex | 36.2% | Barking | 36.8% | 0.6% |
| Crewe Cheshire | 48.2% | Cobridge Stoke on Trent | 41.9% | 6.3% |
| Preston Lancashire | 40.1% | Blackburn Lancashire | 35.0% | 5.1% |

10.7 Wide variations of pass rates can also be found in the same conurbation. The pass rates for the six test centres in Birmingham vary from 32.8% to 46.6% a difference of 13.8%.

10.8 If it was possible to understand the reasons why the pass rates were so much higher at some centres than others it may be possible to take actions that would bring the lower rate centres up to the standard of the higher rated ones.

10.9 We request the select committee to recommend an independent survey of driving test pass rates aimed at understanding and explaining why there are such wide differences in pass rates at various centres.

11 DRIVING TEST FAULT ANALYSIS

11.1 Over the last couple of years, the DSA has started to collect data regarding the pass rates of individual instructor's pupils. It is suggested that at some time in the future these could be published as an indication to the public of the quality of individual driving instructors. At the moment the DSA are sending copies of the data they collect on an annual basis to ADIs. Most of the data collected and sent out is very inaccurate.

11.1.1 *When I initially received my Driving Test Fault Analysis for 1999/2000, it showed 62 tests and a pass rate of 50%. This compared with a true figure of 51 tests and a pass rate of 58.82%.*

In fairness, the DSA did correct the figure after I sent details of my record.

In view of the ultimate plan to publish driving test pass rates this degree of inaccuracy is unacceptable. ADI, West of England

11.2 With the variations in pass rates at different test centres shown above and the fact that a persons ability to pass their driving test can be affected by a wide variety of factors including age, gender, number of lessons, number of test attempts and amount of private practice we believe this exercise is flawed.

11.3 We request the select committee to recommend the suspension of data collection concerning the pass rates of individual instructors pupils, until such time as DSA can produce a system that will adjust the pass rates to take account of individual

pupil differences such as age, gender, number of lessons, number of test attempts and amount of private practice.

12 DRIVING EXAMINER STANDARDS

- 12.1 There is a growing feeling amongst driving instructors that a certain amount of inconsistency is appearing amongst driving examiners. We appreciate that it is impossible to have every examiner mark every fault in exactly the same way. However, it is suggested that more and more examiners are examining to slightly different standards and looking for slightly different styles and skill levels. This makes it much harder for instructors to prepare candidates for driving tests.
- 12.2 We suspect that the reason for this drift in standards has come about because of DSA cut backs in supervisory staff together with involvement in non-statutory activities.
- 12.3 We request the select committee to recommend that the DSA take immediate steps to maintain examiner standards and consistency.**

13 DRIVING TEST FEES

- 13.1 Many driving instructors believe that DSA driving test fees are excessive. The standard fee for a week day car test for a learner driver is £36.75 (the fee earning period relates to one hour). In comparison on average, a driving lesson of one hour's duration costs less than half that price **AND THE PRICE INCLUDES THE USE OF A CAR.**
- 13.2 We request the select committee to recommend an immediate investigation into the DSA pricing policy to ensure that the public is not paying excessive amounts for driving tests.**

14 ADI FEES

- 14.1 Each year the DSA publish their Annual Report and Accounts. Each year the ADI section shows a surplus. As we understand it ADI fees can not be used for any other purpose yet no redistribution of over paid fees is ever made to ADIs, we wonder what the money is used for.
- 14.2 We request the select committee to recommend an immediate investigation into the DSA accounts to ensure that ADIs are not paying excessive amounts for their registration.**

15 ADI STANDARDS

- 15.1 To give driving instruction in a motor car for money or monies worth a person must have their name entered into the Register of Approved Driving Instructors maintained by the DSA. To enter the register a person must pass a theory test and a three part practical examination (the qualifying examinations). Once on the ADI Register instructors must submit themselves to occasional checks of their ability to give instruction (check tests).
- 15.2 Until a few years ago, the practical qualifying exams and the check tests were conducted by a senior grade of examiner called a Supervising Examiner. Then DSA decided that they would provide specialist training to a selection of basic grade driving examiners to allow them to conduct the practical qualifying exams allowing the Supervising Examiners to concentrate on check testing.
- 15.3 Accordingly, the number of Supervising Examiners was allowed to fall as part of their work was going to be carried out by other examiners. However, because of various factors including a lack of examiner recruitment by the DSA, the pressure to keep ordinary driving test waiting times under control, together with other non-statutory duties that the agency have taken on

(see below) most practical qualifying exams are being conducted by an ever-decreasing number of Supervising Examiners.

15.4 This means that only a few check tests are being conducted. It is reported that the DSA check test programme may be as much as two years behind. Whilst few instructors like being check tested we feel it is vital that these checks are carried out if ADI standards are to be improved as set out in the Governments Road Safety Strategy.

15.5 We request the select committee to recommend that the DSA take immediate steps to recover the ADI check test programme within six months.

16 ENFORCEMENT OF ADI REGULATIONS

16.1 Enforcement of the laws and regulations concerning Driving Instruction is the responsibility of the Driving Standards Agency. However, they sub-contract the work of evidence collection and prosecution for those carrying out driving instruction illegally to the Vehicle Inspectorate (VI). Very few prosecutions are ever successfully brought against those giving instruction illegally because the VI refuse to use *agent provocateurs* to trap those instructing illegally. As one of the principal purposes of the Register of Approved Driving Instructors is to protect the public from unqualified tuition we fail to understand why this form of evidence gathering, common amongst trading standards officers, can not be used to protect the public from unregistered driving instructors.

16.2 We request the select committee to recommend the use of *agent provocateurs* by the Vehicle Inspectorate in order to obtain evidence against those instructing illegally and protect the public from unregistered driving instructors.

17 DSA NON STATUTORY ACTIVITIES

17.1 Over the last few years, the DSA has ventured into a number of non-statutory activities, in particular the testing of taxi/private hire drivers and the monitoring of bus/coach drivers. As we understand it any surpluses made from this commercial activity are channelled into their schools programme (discussed below). MSA members have mixed feelings about the DSA venturing into this field. Most would like to see the driving standards of these groups improved, but not at the cost of ever increasing driving test waiting times.

17.2 As we understand it the DSA are entering into commercial contracts with a number of companies and these contracts have built in service levels with penalty clauses. We feel this creates a conflict of interest for the DSA in whether they prioritise their statutory or commercial duties. If an examiner who was due to undertake commercial activity on a particular day is off sick will the DSA move an examiner from statutory duties to ensure they do not incur a penalty under their commercial contract? If this does happen, it will mean disappointed driving test candidates and ever lengthening driving test waiting times. We have discussed above the effect on ADI check testing of an examiner shortage, we believe DSAs non-statutory activities will increase the problems.

17.3 We request the select committee to recommend the suspension of all DSA commercial contracts until such time as they can demonstrate that they have more examiner resource available than is needed to run their statutory services to the highest standards.

18 DSA SCHOOLS PROGRAMME

18.1 The DSA run a programme that entails driving examiners visiting schools to talk about driver training and the driving test. We believe that this a job that could be better undertaken by driving instructors. There are a variety of reasons for this - many ADIs have classroom-teaching certificates such as the C&G 730. There is spare capacity within the ADI work force whereas there is clearly a shortage of examiners as discussed above. Another reason is value

for money. The DETR has just announced that it will pay DSA £250,000 towards its schools programme. This represents extremely poor value for money at £36.75 per hour, as driving instructors would undertake twice the number of hours for the same amount of money. The most compelling reason for stopping examiners doing this type of work is to allow them to concentrate on their statutory duties. Clearly, these are not currently being fully covered.

18.2 We request the select committee to recommend that the DSA schools programme use driving instructors rather than driving examiners.

19 DSA PUBLICATIONS

19.1 The DSA publish a number of books and last year took over the publication of the Highway Code. On publication of the new version it was immediately realised that there were mistakes in some of the advice given, in particular the advice on use of roundabouts. This matter was discussed by MSA officials with a DETR Minister over a year ago. We understood that the first reprint would contain corrections. There have been several reprints and a consultation paper on the matter but still nothing seems to have been done.

19.2 *My worst experience of the DSA is to witness the continued sale of the highway code despite the fact that the DSA are aware that rule 162 is potentially dangerous.* Graham Pick, Ayr.

19.3 We request the select committee to recommend the immediate correction of the Highway Code.

20 DSA INDEPENDENT COMPLAINTS ADVISOR

20.1 If all goes wrong at the DSA there is an Independent Complaints Advisor (ICA) that customers can turn to. Sadly, details of the complaints dealt with and the findings of the ICA are not published. Perhaps because a number seem to be against the ICA!

20.2 *On 11 September 2000 I sent to you a copy of a complaint about the DSA. I note that in the DSA leaflet regarding your function it states "ICA will immediately acknowledge receipt of your complaint."*
I have received no such acknowledgement. Please immediately confirm that you have received my complaint. ADI, South East England. An acknowledgement has now been received dated 14 October. However, up to 16 November no reply had been received over two months after the complaint had been made.

20.3 We do not know who appoints or pays the ICA or what proportion of complaints are found in favour of the complainant and what proportion in favour of the DSA.

20.4 We request the select committee to recommend that the DSA Independent Complaints Advisor publish every three months brief details of the complaints received and the outcome of those complaints.

21 CONCLUSION

21.1 Recently MSA officials visited DSA headquarters at Nottingham for a meeting. Whilst waiting in the entrance hall they spotted the DSA Charter Mark Trophy in a display cabinet. On closer inspection, they noted that the metal nameplate attached to the trophy was tarnished. They were not surprised.