



Department for  
**Transport**

**A Safer Way:**

**Consultation on making Britain's  
roads the safest in the world**

**Response from:**

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## Response to Department for Transport

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### Executive Summary

The BVRLA welcomes the opportunity to provide our comments to the Department for Transport on its consultation seeking views on the vision, targets and measures for improving road safety in Great Britain for the period beyond 2010.

All parties involved with the use of vehicles on the roads have worked hard to reduce the number of people killed on Great Britain's roads which is demonstrated by this number falling to below 3,000 in 2007. We recognise that the Government cannot become complacent given what has been achieved and welcome the opportunity to shape what will hopefully be a strategy which can provide a vision for road safety beyond 2010. We have provided our detailed comments below on the various proposals under consideration.

In principle, we agree with the concept of the targets and vision that the department has set out in the consultation. However, given the progress made to date we would question whether the targets are sufficiently stretching.

We are concerned with the recent press comment of a £28.9 billion cut in the Department for Transport's capital expenditure plans and if this is the case what impact it will have on the future of the road safety strategy. If accident causalities are to reduce it will need continued investment in awareness campaigns and training. We would welcome clarity from the department on this area.

There are a few key areas which we have highlighted below which we wish the department to consider further and perhaps enhance within the strategy:

- **Technology**

Our view is that the strategy is somewhat weak in its approach towards the role of technology. We think the department should view technology as a way to aid compliance and enforcement and it should not be seen as a punishment. With this in mind, the department may wish to consider further work and trials on intelligent speed adaptations used on a non-mandatory basis to help with speed limit compliance. The department should also commit to making a national digital speed map available to allow the market to develop the various speed compliance driver aids.



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- **Training**

Our view is that the consultation is lacking in terms of a vision from the department on training and educational plans going forward. A few suggestions which we would be supportive of are:

- A vocational qualification for professional car and van drivers (NVQ1, driving only, for cars and NVQ2, driving and loading, for vans) – This would provide a set of standards for drivers to adhere to and provide a regular review cycle. It would also provide a national standard for employers to require their business drivers to achieve.
- Minimum driver trainer standards – Currently, it is very easy for anybody to set up their business as a trainer of professional drivers, there are no set standards for trainers and we think this is a vital area which Government should set standards in. This is such an important area that the concept of licencing of these organisations should be considered.

- **THINK! Campaign**

The THINK! campaign has been an excellent awareness raising programme for the motorist, however, our view is that the scope of the campaign should now widen to all road users. It should be educational for pedestrians, cyclists and motor cyclists not just motorists so that goals and targets can be achieved through the engagement of all users of the roads.

- **Reporting**

There are still a number of areas which we do not know enough about in terms of reporting and we would welcome a review of the reporting requirements for at work road accidents. There is some interesting work being conducted by the International Road Assessment Programme which looks at saving lives in developing countries by promoting safer road design and they have produced good templates for reporting requirements.

Following the review of RIDDOR a few years ago, we are disappointed that the Government has not taken forward further work in this area and looked at more effective reporting of at work road accidents. We would recommend that as part of this strategy the Government considers again how to effectively report at work road accidents.

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- **Fines**

We would suggest that the fine regime for driving uninsured is still not penal enough, there are still too many drivers who would consider not buying insurance and running the risk of an occasional fine. Even with the new offence of being a registered keeper of an uninsured vehicle there are ways of avoiding being caught by falsely registering the vehicles. There needs to be a significant increase to the fine to ensure people do not avoid purchasing insurance, our recommendation would be a minimum £2,000 fine and a custodial sentence for persistent offenders.

### Specific Comments

*Vision and targets (Chapters 3 and 8)*

1. Do you agree that our vision for road safety should be to have the safest roads in the world? (Chapter 3)
2. Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years? (Chapter 3)
3. Do you agree that our targets should be to reduce:
  - road deaths by at least 33 per cent by 2020 compared to the baseline of the 2004–08 average number of road deaths;
  - the annual total of serious injuries on our roads by 2020 by at least 33 per cent;
  - the annual total of road deaths and serious injuries to children and young people (aged 0–17) by at least 50 per cent against a baseline of the 2004-08 average by 2020;
  - by at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004–08 average? (Chapter 8)
4. We are proposing a set of indicators in order to help us to monitor performance (Appendix A). Do you believe these cover the right areas? (Chapter 8)

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### Response questions 1-4

We support the approach being taken by the department in terms of vision, review of the visions, targets and monitoring. They seem a sensible and realistic way forward and should support the vision of making our roads the safest in the world. We would question whether the targets are sufficiently stretching and maybe the department should consider a target closer to 40% reduction in KSI rather than 33%.

*Context (Chapters 2, 3 and 4)*

5. We have identified a number of factors that may affect our ability to deliver road safety improvements in the future world we are planning for. Do you think we have taken account of the key risks and opportunities? Are there others you would add? (Chapter 3)

We think most of the key risks and opportunities have been identified, however, we are of the view that legislation should be added as a risk as well due to the focus on other areas such as environment or discrimination. For example, the more pressure motor manufacturers are put under to produce cleaner cars the more likely optional but heavy safety features may be considered surplus to requirements to help keep the CO<sub>2</sub> of the vehicle down.

In addition, we are currently in dialogue with the Government's Equality Office who wish to remove any age restrictions on services provided. This includes car rental, which means that where our members have restrictions in place as to which vehicles younger drivers are allowed to rent from our members, these restrictions will have to be removed. This could mean that an 18 year old who has just passed their driving test could rent a high powered car and cause a danger to themselves and other road users. If this legislation is allowed to go through unchecked this could have a detrimental impact on the safety of Britain's roads.

6. We think that the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree? (Chapter 4)

We agree that there is little scope for further major policy changes and the Government is correct to focus on delivering the safest roads in the world through: technology, compliance and training.

7. This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others? (Chapter 2)

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We have no other areas to highlight, other than perhaps the challenges should focus on education of motorcyclists, children and young people as they are identified as particularly vulnerable groups.

*New performance framework (Chapters 4 and 8)*

8. We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done? (Chapter 4)

We see what is being proposed as workable and think the Driving for Better Business Programme provides a good example of working with professional bodies such as ourselves and other business representatives.

This type of work should continue to be taken forward and should be expanded to include those involved with providing at work driver training.

There are currently no standards which those involved with training employees on driving need to adhere to and this should be included as an area where professional development is needed to ensure those who are training safer driving have the right skill set and qualifications to educate the wider business driving community. As mentioned, we would suggest the Government consider licencing driver training companies to ensure high standards of training are achieved.

9. Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation? (Chapter 4)

Yes, this would be a good report to produce as it will help track progress and highlight areas where further improvement is needed. It may also be worth investigating how this report can be used to track accident trends involving those driving for work. This is an area where data is lacking and this report could provide a good opportunity to help plug the gap.

10. Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan? (Chapter 8)

This seems a sensible approach as the Board would be the best place to oversee delivery of the target and challenging Ministers in Westminster, Scotland and Wales to provide the leadership and resources to ensure that the targets are met.

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### *Roads and local authorities (Chapter 5)*

11. Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved? (Chapter 5)

Whilst we agree that highway authorities should review speed limits on their roads it should not necessarily lead to a reduction in speed limits. Our view is that better enforcement and better education would ensure more compliance with speed limits on single carriageway roads. This would in turn lead to a reduction in accidents.

We would strongly recommend that the training programme which is used when people are caught speeding is expanded and that anybody who is caught speeding has to go through training.

12. How can we most effectively promote the implementation of 20 mph zone schemes in residential areas? What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns? (Chapter 5)

In terms of speed limits we remain unconvinced with the proposals to introduce widespread 20MPH zones throughout the country. We would suggest that more should be done to encourage adherence to the current speed limits rather than reducing speed limits further.

The evidence case for reducing speed limits to 20MPH is not compelling and would not necessarily in our view ensure better compliance. If 30MPH speed limits were better enforced this could equally reduce pedestrian and cyclist casualties. In addition, more could be done on the training for all road users which could equally reduce casualty levels.

13. How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes? (Chapter 5)

The suggestion of the highway authorities working with the Police seems a sensible approach.

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### *Vehicles (Chapter 6)*

14. What should Government do to secure greater road safety benefits from vehicles?

The Government should work closely with manufacturers and users of vehicles to ensure that manufacturers are taking into account the needs of users and Government requirements in terms of improving road safety.

15. Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?

We think that Government should carefully consider and review all options in terms of technology and those that have been tested and carefully researched should be considered first. We are also concerned with technology which removes the responsibility from the driver as this has the potential to create complacency. For example, crash avoidance systems give the impression that you can never crash and therefore as a driver you may drive faster. We believe that technology should focus on speed compliance and be on a much more advisory basis than taking control of the vehicle.

16. How can we best encourage consumers to include safety performance in their purchasing decisions?

The Government could work with manufacturers and insurance companies to ensure that safety performance is given higher priority in terms of the vehicle information which is provided when a consumer is considering purchasing a car.

### *Behaviours (Chapter 7)*

17. We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

We agree with the assessment that the most dangerous driving behaviours are: drink-driving, drug driving, speed, failure to wear a seatbelt and careless driving.

18. What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

Firstly, the Government should build confidence with the motorist that speed limits are appropriate for the particular road. The next step would be to use the Think! campaign to re-enforce that speeding is breaking the law.



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19. What more can be done to encourage safe and responsible driving?

Our view is that this should be extended to not just safe and responsible driving but safe and responsible road use. This could be in the form of education to people of all ages and all forms of transport to encourage safe and responsible driving.

20. Should more be done to reward good driving? If so, what?

Yes, we think this is an approach which should be given more consideration. We would suggest that programmes could be developed through businesses which are supplemented by Government and the insurance industry to encourage good driving and adherence to the law.

### **Closing Comments**

We hope our comments have gone some way to shaping and developing the road safety strategy with the long term visions of reducing the number of deaths on Great Britain's roads.

Our members strive to provide the newest safest vehicles and assist their customers wherever possible with safe driving at work. We have recently revised our Driving at Work guide which is for our members and their customers and aims to be used as a tool for all parties involved with either advising on or driving at work.



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### **Leasing Members**

In general, vehicle leasing, sometimes referred to as long term rental, is an arrangement where the user (the hirer) simply hires the use of the vehicle and assumes operational responsibility for a predetermined period and mileage at fixed monthly rental from the owner (the leasing company). Legal ownership is, in the majority of cases, retained by the leasing company.

### **Short Term Rental Members**

Rental Members offer daily, weekly and monthly rental of vehicles to corporate and retail customers. As explained above, the contract hire and daily rental Members are the owners of the vehicle.



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***Bona-fides*** **BVRLA, the Industry and its Members**

- The BVRLA is the trade body for companies engaged in the leasing and rental of cars and commercial vehicles. Its Members provide rental, leasing and fleet management services to corporate users and consumers. They operate a combined fleet of 2.6 million cars, vans and trucks, buying 44% of all new vehicles sold in the UK.
- Through its Members and their customers, the BVRLA represents the interests of more than two million business car drivers and the 10 million people who use a rental vehicle each year. As well as informing the Government and policy makers on key issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct.