

Impact Assessment

Version 08/2013

Impact Assessment completed by:		Responsible officer:	
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1. Background

1.1 Title:

Transfer of Devon Travel Academy to Devon and Somerset Fire and Rescue Service

1.2 Description:

Devon Travel Academy (formerly Devon Drivers' Centre) has been providing driver training services since 1991 and helps DCC, through the Safer Travel Team, fulfil its statutory obligations for road safety training and education. DTA has been a central (and nationally acknowledged) feature of the DCC Road Safety function during that time, enabling a very specific approach to road casualty reduction which targets resources at the source of danger (the motorist) rather than the victim. The emphasis on driver training and development in DfT's Strategic Framework for Road Safety¹ recognises the value of this approach - and Devon's own record of road casualty reduction demonstrates that this is a successful model.

Services are provided on a client-pays basis, though DTA has never achieved full cost recovery. This reflects the requirement that DTA, whilst operating on a semi-commercial footing, is also required to act in support of our strategic road safety interests which may not be compatible with generating surplus.

¹ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

Devon and Somerset Fire and Rescue Service (DSFRS) is a key road safety partner and, whilst it does not share the same statutory responsibilities for road safety as the highway authority, it has nevertheless interpreted its injury prevention role as requiring a strong commitment to road casualty reduction. Additionally, DSFRS has a long-standing ambition to develop a commercial training capability but has yet to make that a reality.

This proposal is being made in the following context: (a) the Council's commitment to becoming a commissioner of services rather than a provider ; (b) DSFRS's ambition to develop its cost-recovered services and invest in prevention; (c) a clear evidence base that Devon's road safety issues are behavioural in nature² and road safety interventions are required that address this long term issue and (d) although driver training for provisional license holders is well catered for specialist pre- and post-test training is scant, untargeted, of greatly varying quality and, as it's provided by single instructor operators with no coordinating body, is difficult and costly to procure or regulate.

DTA currently operates with two officers comprising 1.5 FTEs, with additional administrative support from temporary staff. It is expected that its budget will be in deficit by approximately £55,000 this current financial year.

The proposal is to re-assign the lease (which currently has 26 years remaining) and transfer all material and business assets to DSFRS in a way that will enable them to continue delivering service with limited interruption. The transfer will include a TUPE process for the 1.5 FTEs currently providing DTAs management and administration.

An objective of this asset transfer is that DSFRS will maintain a core service that reflects the current and future principal strategic road safety interests of DCC. Currently this includes services for younger and older drivers; at-work drivers and motorcyclists.³ This will enable Devon's Road Safety Team to become a client of a future Devon Travel Academy, adopting a flexible approach to service commissioning as dictated by the road casualty evidence base.

The proposal further includes changes to the lease and a deed of assignment that will indemnify DCC against residual liabilities under the leases following assignment.

1.3 Service users:

Service users cover a broad spectrum and include:

- Young people aged 16 years preparing to drive
- Young qualified drivers between the ages of 17 and 24
- Older drivers aged 55 and over
- Motorcyclists
- People with health issues (often but not exclusively age related)
- Driver and rider training owner-operators

² http://www.devon.gov.uk/2012_year_end_report.pdf

³ <http://www.devon.gov.uk/loadtrimdocument?url=&filename=PTE/14/61.CMR&rn=14/WD369&dg=Public>

- Local and regional businesses
- Public sector organisations
- Schools – staff and volunteers
- Emergency services (including Police; SW Ambulance NHS Trust)
- Neighbouring highway authorities
- DCC personnel
- Partner agencies (e.g. South West Highways; Plymouth Schools Sports Partnership; Safety Camera Partnership)
- Special interest groups (e.g. Advanced Driver and Rider Groups; British Cycling and local cycling clubs; Age Concern; WI etc.)

1.4 Describe any reasons for change and intended aims and benefits:

The aim of this proposal is to enable a longer term future for an important road safety facility, whilst ensuring that DCC is no longer responsible for the associated and growing liabilities. Transferring the asset to DSFRS will achieve a number of intended benefits:

- As a commissioner of service Devon road safety will be able to focus only on those services that contribute to casualty reduction in the most at-risk groups of motorists
- Retaining a core DTA service at arms length will allow DCC to retain the benefits of a driver training and education centre whilst divesting itself of on-going liabilities (staff and infrastructure)
- As both a provider and commissioner of services, DTA requires significant revenue investment to allow it to develop the breadth and quality of services required by the market. The broader business model proposed by DSFRS is more likely to enable this investment to take place.

1.5 Overlap with other policies, services etc.:

Road Traffic Regulation Act 1984 Chapter 27, Part III, Section 26⁴
 Disability Discrimination Act (DDA) 1995
 Devon Health and Wellbeing Strategy⁵
 Devon Strategy for Growth 2013-2020⁶
 Devon and Somerset Fire and Rescue Service Corporate Plan 2012-15⁷

1.6 The following stakeholders have been involved in this assessment:

At this stage, the proposals have been considered internally as part of the PT&E budget proposals. A report will be taken to CLT/Cabinet for initial views on the approaches described in Section 1.2.

⁴ <http://www.legislation.gov.uk/ukpga/1988/52/section/39>

⁵ <http://www.devonhealthandwellbeing.org.uk/wp-content/uploads/2014/05/Devon-Joint-Health-and-Wellbeing-Strategy-2013-to-2016.pdf>

⁶ <http://www.devon.gov.uk/strategy-for-growth-2013-2020.pdf>

⁷

http://www.dsfire.gov.uk/AboutUs/WhatWeDo/OurCorporatePlan/documents/CORP_PLANfinalpdfJun122.pdf

1.7 The following research or guidance has been referred to, or advice sought, in order to inform the assessment:

- Devon Annual Road Casualty Review⁸
- Department for Transport Strategic Framework for Road Safety⁹
- A range of research documents / literature reviews relating to key DTA client groups / at-risk motorists, some of which are published by Devon¹⁰
- National and international research on the relationship between social, economic and educational background and road risk (referenced elsewhere in this assessment).

2. Analysis

2.1 Social impacts

Giving Due Regard to Equality and Human Rights

	In what way is this characteristic relevant, or not relevant, to the service, policy or practice?
Age:	Some services are age specific – specifically young, emerging and novice drivers in the 17-24 years group and older drivers of 55 years and above. Each falls into a higher risk category. However, because they are higher risk groups the asset transfer will come with an objective that suitable and sufficient services are maintained for these groups.
Disability:	Some services are specific to those with disabilities and mental or physical health issues. Where this crosses over into those of advancing age we would expect them to be catered for as above. Private sector provision exists for training and assessing the mobility impaired but such services also commonly use DTA infrastructure to deliver those services (e.g. the road circuit). We will encourage the new leaseholder to ensure that such facilities remain accessible to those who need them.
Gender/Sex (men and women):	Some services are tailored to individual needs on the basis of gender. This approach is also available through private sector provision. In addition, DSFRS operate to policies under the Equality Act 2010 compatible with those of DCC.
Marriage and civil partnership:	Not applicable
Pregnancy and maternity:	DTA hosts services that support expectant mothers and families with new born or young children. The services are not, however, the responsibility of DTA to deliver. The new leaseholders will be encouraged to support those who provide these services.
Race/ethnicity:	Not applicable

⁸ <http://www.devon.gov.uk/index/transportroads/roads/roadsafety/collision-stats/safer-travel-year-end-report.htm>

⁹ <https://www.gov.uk/government/publications/strategic-framework-for-road-safety>

¹⁰ http://www.devon.gov.uk/index/transportroads/roads/road_safety/collision-stats.htm

Religion/belief:	Not applicable
Sexual orientation:	Not applicable.
Trans-gender/gender identity:	Not applicable.
Other (e.g. socio-economic, general health and wellbeing, geographic communities, human rights, safeguarding):	There is evidence of a relationship between lower socio economic groups; poor educational standards; poor standards of health and road risk. The not-for-profit model used by DTA for its services is important to ensuring fair and equitable access to professional training at affordable prices to social groups with less disposable income. DSFRS will be associating DTA with both its charitable and non-commercial community safety wings. As such the new leaseholders will be encouraged to maintain a not-for-profit operating model for those groups most likely to be excluded on the basis of cost.

2.1.1 Positive impacts:

The proposal seeks to provide long term stability for DTA by transferring the lease to an organisation which is already a road safety partner; has shared strategic goals and is maintaining a sustained commitment to injury prevention. By working with DSFRS to enable retention of those services most critical to reducing road casualties, and encouraging low cost provision to those in greatest need, it will be quite possible for DTA to maintain a commitment to those social groups in greatest need of training support.

2.1.2 Negative impacts and mitigations or justification:

In applying a new business model and new suite of services to DTA, DSFRS is likely to end some of the services currently provided by DTA. However, as DCC will commission those services most critical to road casualty reduction in Devon are maintained the net negative effect on road safety should be minimised. Further, DSFRS are likely to offer greater financial flexibility in investing in service development and standards improvement and extending market reach through advertising. This may result in more people being aware of and having access to a broader range of services.

2.3.4 Neutral impacts:

Where key services are identified as making a contribution to the safety of higher risk groups there should be no change in service provision. DSFRS have indicated that they want DTA to act as a partnership hub, offering a base for officers from Fire & Rescue, Police and DCC – thereby retaining a DCC presence at the Academy and allowing DCC officers to influence service focus, content and quality.

2.2 Economic impacts

	In what way is this factor relevant, or not relevant, to the service, policy or practice?
Impact on knowledge and skills:	DTA is a full commissioning unit and all services are delivered through private sector providers. DTA takes responsibility for the professional development of contractors delivering services on its behalf.
Impact on employment levels:	
Impact on local business:	

2.2.1 Positive impacts:

A potential expansion of service and customer range at DTA may increase downstream use of private sector trainers, putting more money into the local driver training economy. An expansion of training support for local small businesses would also be expected to improve risk management and reduce financial loss amongst some of the more vulnerable members of the local economy.

2.2.2 Negative impacts and mitigations or justification:

It is possible that DSFRS will favour an operating model in which its own personnel deliver services. If this is the case then fewer private sector trainers will benefit from DTA business and the professional development opportunities that come with it. The downstream effect of this is young learners not benefiting from instruction that is informed and shaped by the training their instructors have received from DTA.

However, DSFRS are an organisation committed to professional development in this field, often supported by DCC staff. If they do keep service delivery in-house it is still likely that standards offered will be of a higher and developing standard. We would, however, anticipate some reduction in the contribution to the local training economy.

Downstream effects on the standard of service offered by driving instructors will be off-set by other DCC projects which provide training, information and support to professional instructors.

2.3 Environmental impacts

2.3.1 The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please select and proceed to Section 2.3, otherwise complete table below):

N/A	Devon County Council's Environmental Review Process for permitted development highway schemes.
N/A	Planning Permission under the Town and Country Planning Act (1990).
N/A	Strategic Environmental Assessment under European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".

	In what way is this factor relevant, or not relevant, to the service, policy or practice?
Reduce waste, and send less waste to landfill:	Not relevant
Conserve and enhance biodiversity (the variety of living species):	Not relevant
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:	Not relevant
Conserve and enhance the quality and character of our built environment and public spaces:	Not relevant
Conserve and enhance Devon's cultural and historic heritage:	Not relevant

Minimise greenhouse gas emissions:	Not relevant
Minimise pollution (including air, land, water, light and noise):	
Contribute to reducing water consumption:	
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):	
Other (please state below):	

2.3.2 Positive impacts:

By acting as a partnership working hub a substantial number of routine journeys made by officers attending meetings should be reduced.

2.3.3 Negative impacts and mitigations or justification:

2.4 Combined Impacts

2.4.1 Linkages or conflicts between social, environmental and economic impacts:

There is evidence of a relationship between lower socio economic groups; poor educational standards and road risk.^{11,12,13}

2.4.2 'Social Value' of planned commissioned/procured services:

By changing the status of DCC into a commissioner of service from DTA, DCC will be able to concentrate its investment on those areas of service most likely to help reduce risk, casualty numbers and injury severity.

Road traffic casualty prevention is valued using a Willingness To Pay model which reflects the social value placed on RTC prevention.

Current values are approximately £1.9m per prevented fatality; £216k per prevented serious injury and an average value of prevention across all severities of £50k per casualty.¹⁴

2.4.3 Potential impact on partner agencies:

This proposal has the advantage of impacting positively on partner agencies who will have greater opportunity to invest in providing road user training services directly to their client base. The opportunities for income generation may also enable them to offer critical road safety services at a lesser cost to those groups of road user most at risk.

¹¹ <http://www.rosopa.com/roadsafety/policy/statements/info/social-factors-in-road-safety.pdf>

¹² <http://cat.inist.fr/?aModele=afficheN&cpsidt=2120737>

¹³ <http://www.cornwall.gov.uk/media/3625473/deprivation-reportfinal-3-.pdf>

¹⁴

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/9275/rrcgb2011-02.pdf

The proposal offers the first opportunity for creating a partnership hub, offering a permanent base for officers across the three key agencies involved in road casualty reduction – DCC, DSFRS and D&CP.

The proposal is also likely to result in a broader and deeper skills and knowledge base for partner officers taking on new roles in driver and rider training and education.

3. Actions and risk management

3.1 Actions:

Summarise any actions that will be taken to enhance positive impacts and prevent or minimise negative impacts and remove potential for unlawful discrimination. Name the relevant business or project plans for implementation and monitoring. Make sure actions are SMART:

The proposal is to transfer Devon Travel Academy as a going concern with all services intact to an organisation with shared responsibilities and strategic priorities for road casualty reduction. Whilst it is fully expected that the operational profile and service output of DTA will change following its transfer, the conditions under which the transfer takes place will include a requirement to retain services that meet the needs of our highest risk road users. The creation of an environment in which DCC officers will continue to work at DTA alongside officers in both DSFRS and D&CP will also mean that DCC will be in a position to influence service priorities.

DCC will also maintain its current commitment to provide professional, expert support to DSFRS in the development, delivery and monitoring of training and educational services. This is compliant with the preferred and current operating model for Devon road safety so, whilst requiring no additional resource, will also help to influence the breadth, relevance and quality of services retained by DTA.

3.2 How will you monitor the actual impacts of recommendations/decisions (consider what service user monitoring and consultation is necessary)?

Three tiers of monitoring will back up this proposal:

- Annual analysis of road traffic collision data will provide a review of the extent to which poor road user skills remain a feature of road traffic collisions in Devon
- The Road Safety Manager will advise on, and monitor, the general direction of service provision at DTA with specific reference to those services most likely to influence road risk
- Road Safety Officers, working with partner colleagues, will be in a position to monitor, and influence, the content, delivery and effectiveness of those services.

Where monitoring suggests a disconnect between DTA services and casualty outcomes this will be reviewed and managed through existing partnership arrangements.

3.3 Risk assessment

Inherent risk (mark an X in one box).

The risk **without** mitigating actions in place/prior to any changes.

Severity	Catastrophic	5					
	Major	4					
	Moderate	3			x		
	Minor	2					
	Negligible	1					
			1	2	3	4	5
			Rare	Unlikely	Possible	Likely	Almost certain

Likelihood (in a 5 year timeframe)

Current risk (mark an X in one box).

The risk **with** mitigating actions/changes in place.

Severity	Catastrophic	5					
	Major	4					
	Moderate	3					
	Minor	2		x			
	Negligible	1					
			1	2	3	4	5
			Rare	Unlikely	Possible	Likely	Almost certain

Likelihood (in a 5 year timeframe)