



SENIOR TRAFFIC COMMISSIONER

Introduction to the

Statutory Guidance and Statutory Directions

The production of the Statutory Guidance and the Statutory Directions presented the drafting team and I with a real opportunity to innovate and to ensure that traffic commissioners, as the specialist regulatory tribunals and licensing authorities for road transport, can deliver what the regulated industries and our local communities need.

My colleagues and I continue to listen to industry and local stakeholders. Initial work by internal consultants has confirmed what stakeholders have told us about the positive impact which effective and proportionate regulation can have. This has not stopped the drafting team from taking a radical look at what business needs and asking how we can better equip and support individuals so that they are not beholden to officials or central government for answers to the challenges which they face.

The starting point of course has to be the law. Parliament has directed my powers, to which the expectations of the Secretary of State have been added. The publication of these statutory documents not only challenges traffic commissioners to continue to deliver but also provides them with the means to improve consistency. However consistency of approach should not be mistaken for uniformity of decisions and the statutory documents not only allow for but encourage local innovation, supporting independent decision making on a case by case basis. The statutory documents are intended to give my professional colleagues the freedom to open up the services we provide.

Whilst the statutory documents follow on from the work first outlined in our Modernising Agenda, the documents represent a new approach in the efforts to reduce the burden on businesses. Their publication sees a reduction in the number of previous Practice Directions and Guidance Notes but they also attempt to make the existing regulatory requirements more accessible. The documents are therefore more than just an update of terminology and administrative procedures. The drafting team has taken up the challenge to give more information to the communities, neighbourhoods and individual businesses which we support, so that our stakeholders can play a bigger part.

How to use the documents

Stakeholders will be relieved to hear that it is not necessary to read all of the statutory documents. They have been drafted as a reference to be used as and when required by traffic commissioners, OTC staff, businesses, drivers, local stakeholders, industry representatives, advocates etc.



The construction of the statutory documents reflects my different powers and how they impact. Section 4(4) of the Public Passenger Vehicles Act 1981 as amended requires that traffic commissioners act under general directions of the Senior Traffic Commissioner and, in contrast, that they shall have regard to any guidance issued by the holder of that office.

As this would suggest the Senior Traffic Commissioner has two relevant powers:

section 4C(1)(a), the power to issue guidance; and

section 4C(1)(b), the power to issue general directions.

Whilst both provisions are directed at traffic commissioners they are separate powers and the statutory documents are therefore separated in to Statutory Guidance and Statutory Directions. The terms are not specifically defined in statute but the drafting team has referred to subsection (2), which provides a non-exhaustive list of what might be the subject of guidance, and subsection (3), which provides a non-exhaustive list of what might be covered by general directions. Whilst these lists are not exhaustive there is a clear implication that Parliament intended that those matters covered by subsection (2) should not be the subject of directions and vice versa, for instance it is through Statutory Guidance that the Senior Traffic Commissioner can indicate the meaning and operation of any enactment or instrument.

The statutory documents are clearly defined and have the contents marked at the front for ease of navigation. Any interpretation of the law can only be current as at the date of publication. The documents identify and apply principles extracted from case law. The footnotes cannot provide an exhaustive list of the relevant provisions and case law, for which it may be best to refer to the digest of the Administrative Appeals Chamber of the Upper Tribunal (www.transporttribunal.gov.uk). Where it may be necessary to refer to another statutory document this is also indicated.

Whilst I am proud of the investment of time and effort which went in to producing the first ever Statutory Guidance and Statutory Directions, I will continue to review and update these documents as required, particularly in anticipation of the new EU Regulation which deals with Access to the Occupation of Road Transport Operator in December 2011. I am convinced that they will be of benefit to all those who rely on our tribunal and licensing functions.

Philip Brown

Senior Traffic Commissioner

23 December 2010

January 2011



**PUBLIC CONSULTATION
DOCUMENT ON SENIOR TRAFFIC
COMMISSIONER'S STATUTORY
GUIDANCE AND STATUTORY
DIRECTIONS**

**PUBLIC CONSULTATION ON THE
CONTENT OF THE SENIOR TRAFFIC
COMMISSIONER'S STATUTORY
GUIDANCE AND STATUTORY
DIRECTIONS NUMBERS 1-11 AND 14**

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1. Introduction

1.1 Who should read this consultation document?

1.1.1 This consultation document will be particularly relevant to any of the following:

- Those with a goods vehicle or public service vehicle (PSV) operator's licence.
- Those with a vocational entitlement to drive a bus or lorry.
- Local authority representatives involved with the provision of bus services in England and Wales.
- Bus and coach passengers or any groups which represent them.
- Banking and financial service providers for the commercial vehicle operating industry

2. Background

2.1 Historically, the Senior Traffic Commissioner and traffic commissioners have issued practice directions and guidance notes to assist those who deal with goods and public service vehicle operator licensing in understanding the practices and procedures that apply to the licensing and regulation of the industries concerned.

2.2 This guidance (in the form of a practice direction) is published on the Vehicle and Operator Services Agency's website.

3. Reason for change

3.1 The Local Transport Act 2008 requires the statutory Senior Traffic Commissioner to provide guidance and directions as to the way in which traffic commissioners will approach the exercise of their statutory functions. The existing guidance notes and practice directions have been reviewed and provide revised guidance, which is the subject of this consultation. Guidance and directions which deal with the same topic are contained in one document.

3.2 All guidance and directions will be issued by the Senior Traffic Commissioner as prescribed by the Local Transport Act 2008.

3.3 Please note that the existing guidance notes for staff will become the Senior Traffic Commissioner's statutory Directions and the existing practice directions for industry will become the Senior Traffic Commissioner's statutory Guidance, as prescribed by the Local Transport Act 2008.

4. Why is it important to respond?

4.1 This consultation is an important opportunity for those subject to or affected by any of the traffic commissioners' functions to express their views to the Senior Traffic Commissioner on what areas the statutory Guidance and statutory Directions should cover and what the documents should say.

5. How do I make my views known?

5.1 We welcome views from all who may be affected by these proposals. The consultation closes on 25 February 2011. It would be helpful if you could reply using or including the consultation response form at Annex A; completing one response form for each statutory Guidance and Direction that you wish to comment on. If you require hard copies or accessible versions of this document please use the contact details outlined below.

5.2 The consultation should be accessible online from 10 January 2011 at www.dft.gov.uk/consultations/open/. The consultation closes on 25 February 2011.

Please ensure that if you submit your response by post it is clearly marked for the attention of Hugh Edwards at the following address:

Hugh Edwards

Head of STC Policy and Planning

Floor 3

Berkeley House

Croydon Street

Bristol

BS5 0DA

6. What happens next?

6.1 Following the closing date for responses, the Senior Traffic Commissioner will publish a summary of formal responses to the consultation and determine the final content of the guidance and directions. The Senior Traffic Commissioner plans to publish and implement the statutory Guidance and Directions by the end of March 2011.

6.2 The traffic commissioners and VOSA support staff will adopt the agreed processes and adhere to the guidance and directions to ensure there is a consistent approach to the licensing and regulation of the goods and public service vehicle industries.

7. Draft Guidance and Directions

7.1 The draft Guidance and Directions are attached separately. Comments are welcomed on any aspect of the guidance and directions, although questions that we are particularly seeking views on are listed in the response form at Annex A below. Please fill out a separate response form for each Statutory Guidance and Direction that you wish to comment on. You will notice there is a box and the start of the form where you can indicate to which Guidance and Direction the form relates.

8. Replying to this consultation

8.1 Disclosure of responses

8.1.1 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004

8.1.2 If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

8.1.3 In view of the above provisions it would be helpful if you could explain to us why you regard the information you have provided as confidential. If the Senior Traffic Commissioner's (STC's) Secretariat receives a request for disclosure of the information it will take full account of your explanation, but cannot give an assurance that confidentiality can be maintained in all circumstances.

8.1.4 The Department for Transport and the STC Secretariat will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

8.1.5 Although Traffic Commissioners are not bound by the Code of Practice on Consultations¹, (www.bis.gov.uk/policies/better-regulation/consultation-guidance), we have applied the guiding principles for this consultation. Further information relating to the Senior Traffic Commissioner's general consultation policy is at Annex B, which includes a list of consultees.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Featherstone', is enclosed in a light grey rectangular box.

Linda M Featherstone

STC Secretariat Manager

¹ July 2008 – Department for Business, Enterprise and Regulatory Reform

Annex A

CONSULTATION RESPONSE FORM



Please fill in a separate form for each Direction and/or Guidance that you are responding to – thank you

This response relates to Guidance and/or Direction Number:	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; padding: 2px;">①</td> <td style="text-align: center; padding: 2px;">2</td> <td style="text-align: center; padding: 2px;">3</td> <td style="text-align: center; padding: 2px;">4</td> <td style="text-align: center; padding: 2px;">5</td> <td style="text-align: center; padding: 2px;">6</td> <td style="text-align: center; padding: 2px;">7</td> <td style="text-align: center; padding: 2px;">8</td> <td style="text-align: center; padding: 2px;">9</td> <td style="text-align: center; padding: 2px;">10</td> <td style="text-align: center; padding: 2px;">11</td> <td style="text-align: center; padding: 2px;">14</td> </tr> <tr> <td colspan="12" style="text-align: center; padding: 2px;">PLEASE CIRCLE ONE (ONLY)</td> </tr> </table>	①	2	3	4	5	6	7	8	9	10	11	14	PLEASE CIRCLE ONE (ONLY)											
①	2	3	4	5	6	7	8	9	10	11	14														
PLEASE CIRCLE ONE (ONLY)																									

Name	Jonathan Bray
Address	40 - 50 Wellington Street, Leeds
Postcode	LS1 2DE
Email address	Jonathan.bray@pteg.net
Company name or organisation (if applicable)	pteg (Passenger Transport Executive Group)
If you would like your response or personal details to be treated confidentially please explain why:	

Question 1: Do the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Answer 1: 		

Question 2: Do any parts of the guidance and/or directions require clarification? If so, please refer to the paragraph number and explain why.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Answer 2: 		

Question 3: Are there any aspects of guidance and directions which, as drafted, should not be included? If so, please explain why.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Answer 3:		

Question 4: Are there other provisions not included in these guidance and directions that should be? If so, please explain what they are.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Answer 4: PTEs have a good knowledge of the local operating market which includes the individuals who are repeatedly involved in poor quality PSV operations. If PTEs were consulted TCs in this area they could share this intelligence with the TCs enabling the TCs to make better informed judgements in this area.		

Question 5: Are there aspects of these Guidance and Directions which seem likely to increase your financial or administrative burdens? If so please explain what they are and, if relevant, what changes would reduce the increase.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Answer 5:		

Please send your completed form to: sstc@otc.gsi.gov.uk or by post to:

Hugh Edwards
 Head of STC Policy and Planning
 Floor 3
 Berkeley House
 Croydon Street
 Bristol
 BS5 0DA

Please ensure that if you submit your response by post it is clearly marked for the attention of Hugh Edwards.

The deadline for responses is: 25 February 2011

January 2011

Annex B



Senior Traffic Commissioner

Administrative Policy

2010 No.02

CONSULTATIONS

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Appendix A Consultation calendar (WIP)

Appendix B Consultee list

Issued:

A handwritten signature in black ink that reads "Philip Brown".

Philip Brown

Senior Traffic Commissioner

January 2011

1. Introduction

The Senior Traffic Commissioner is required by law to consult before exercising his powers under the Public Passenger Vehicles Act 1981 (as amended) to give guidance and/or general directions.

The Secretary of State's Guidance to the Senior Traffic Commissioner suggests that the Senior Traffic Commissioner (STC) develops a stated approach to consultation:

The Secretary of State considers that the STC should set out how and in what circumstances he intends to use his powers under section 4C of the 1981 Act to issue directions and guidance. This should include the general approach the STC would usually expect to take as to consultation under section 4C(4) of the 1981 Act and the process for dealing with responses. As a general rule, the Secretary of State expects the STC to follow published Cabinet Office consultation guidelines. (page 9, paragraph A6)

The STC's Administrative Guidance on Stakeholder Engagement suggests how the traffic commissioners might obtain optimum value from working with others.

The STC has identified 3 key groups with whom the STC will consult; users, providers and other stakeholders and makes the following consultation promise:

- to adhere to the principles outlined in the Cabinet Office consultation guidelines;
- to use consultation to support the effective development of policies and procedures;
- to provide clear information and make consultations accessible;
- to provide a clear explanation for each consultation and give adequate time to respond;
- to give feedback and show how the consultation process has influenced the outcome;
- to place responses to consultations in the public domain using the traffic commissioner web pages.

This document explains in more detail the policy to which the STC will adhere when conducting consultations.

2. The policy

2.1 Why the STC consults

The STC wants all stakeholders to be aware of how the operator licensing system works and how administrative policies support that system and the specialist regulatory tribunals upon which heavy goods and passenger vehicle industries rely. The STC sees consultation as one of the key mechanisms for achieving this aim. The feedback offered by those who represent or work in the regulated industries and who are affected by any proposals, provides valuable insights that can assist in ensuring that proposals are workable and will meet the required outcomes.

2.2 Different types of consultation

Consultation can take a number of forms. It may be a one-off exercise or extend over a period of time. The table below outlines the different types of consultation available:

Type	When to use it	Explanation
Informing	Where a decision has been taken and consultation is not required.	Providing information about the traffic commissioners, their aims, the administrative standards expected, advising on priorities for the coming year and the results of decisions.
Consulting	Where views will be taken into consideration when making a decision.	Discharging the STC's legal obligations. Obtaining views on proposals or initiatives and taking them into account when decisions are made.
Involving	Where we are asking for ideas and encouraging involvement in making a decision.	Seeking out new ideas and suggestions and encouraging stakeholders to participate in the decision-making process.

2.3 Consultation guidelines and principles

The Department for Business, Innovation and Skills has developed a code of practice on consultation and this is summarised below:

When to consult - Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Duration of consultation exercises - Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Clarity of scope and impact - Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Accessibility of consultation exercises - Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

The burden of consultation - Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Responsiveness of consultation exercises - Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Capacity to consult - Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

This summary will be reproduced in all STC consultation documents.

2.4 STC consultation principles

The following principles will apply to consultations undertaken by the STC:

- Consultation will be with members of the relevant group(s).
- A calendar of upcoming consultations will be maintained (see Appendix A for outline).
- Consultation will usually be undertaken through a written consultation document, accompanied by a standard introduction setting out the purpose, consultees and timescale
- Consultation will normally be with all the stakeholders designated in the STC consultation policy (see Appendix B for list), unless there is a reason for only consulting with specific groups.
- Where appropriate, consultees will be provided with a structured consultation pro-forma on which to respond, although this will not preclude other responses.
- In line with the development of e-services in government, an on-line response facility will be developed as technology and access allow.

- All consultation documents and consultation responses will normally be considered as public documents, unless respondents specifically wish their responses to remain anonymous.
- Consultation will be proportionate to the issues involved. Major consultation will normally allow a minimum of twelve weeks for responses and, wherever, possible seek to avoid or extend the duration over traditional holiday periods. A shorter period may be appropriate in circumstances where there is an urgent requirement.

2.5 STC Consultation standards

To assist those wishing to respond the STC has adopted a standard process for consultation. This will:

- Provide a consistent approach and structure to consultation.
- Allow documents to capture information in a structured way.
- Provide a process which allows quality control, evaluation and monitoring of the process.
- Measure the effectiveness of consultation on decisions.
- Provide a system which can be adapted/improved based on qualitative and quantitative feedback.
- Demonstrate that the STC is listening to all groups.

Appendix A

Traffic Commissioner System consultation calendar 2010/11

Expected start date	Consultation				Of particular interest to...						Expected end date
	Ref	Title	Main contact	Method	Goods trade	PSV trade	VOSA	DfT	Police	Other stakeholders	
Sep-10	1	Good repute and fitness	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	Dec-10
Sep-10	2	Financial standing	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	Dec-10
Sep-10	3	Transport managers	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
Sep-10	4	Operating centres	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	Dec-10
Sep-10	5	Legal entities	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	Dec-10
Sep-10	6	Case management	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	Dec-10
Sep-10	7	Principles of decision making	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
Sep-10	8	Vocational driver conduct	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
Sep-10	9	Impounding	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
Sep-10	10	Written decisions	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
Sep-10	11	Appeals	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Dec-10
#	12	Local bus services	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	#
#	13	Quality Contracts and Quality Partnerships	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	#
Sep-10	14	Delegation of authority	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	Dec-10
#	15	Gifts and hospitality	Hugh Edwards	Email/Website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				#

January 2011

Consultee list

Administrative Justice & Tribunals Council
Arriva Plc
Asset Based Finance Association
Association for Road Traffic Safety Management
Association Industrial Road Safety Officers
Association of British Drivers
Association of British Insurers
Association of British Motor Clubs
Association of Car Fleet Operators
Association of Chief Police Officers
Association of Chief Police Officers (Scotland)
Association of Commuter Transport
Association of Independent Businesses
Association of Industrial Road Safety Officers
Association of International Couriers and Express Services
Association of London Government
Association of MOT Consultants
Association of Vehicle Recovery Operators
Association of Vehicle Recovery Operators Limited
Association of Road Transport Lawyers
Association of Police Authorities
Association of Transport Coordinating Officers
Association of County Councils
Association of District Councils
Association of Unitary Authorities
Automobile Association
Big 5 Bus Group
BRAKE
British Aggregates Association
British Association of Removers
British Independent Motor Trade Association
British Industrial Truck Association
British Institution of Traffic Education Research
British International Freight Association
British Parking Association
British Safety Council
British Vehicle Rental and Leasing Association
British Vehicle Salvage Federation
Business Enterprise and Regulatory Reform
Bus Users UK

Calibration & Repair Services Ltd
Campaign Against Drink Driving
Campaign for Better Transport
Chartered institute of Logistics and Transport
Chartered Institution of Waste Management
Chemical Industries Association
Chief Fire Officers Association
Child Accident Protection Trust
Coach Monthly
Coach Operators Federation
Commercial Motor
Commission for Integrated Transport
Community Alternative Transport Association
Community councils
Community Matters
Community Transport Association UK
Confederation of British Industry
Confederation of Passenger Transport Scotland
Confederation of Passenger Transport UK
Confederation of Passenger Transport Wales
Consumers Association
Convention of Scottish Local Authorities
County Road Safety Officers Association
Crown Offices and Procurator Fiscal Service
Denby Transport
Department for Transport
Department of Environment for Northern Ireland
Deputy Traffic Commissioners
DHL
Disabled Persons Transport Advisory Committee
District Courts Association
Driver and Vehicle Agency (Northern Ireland)
Driver and Vehicle licensing Agency
Driving Instructors Association
Driving Instructors Scottish Council
Driving Standards Agency (DSA)
Eddie Stobart Ltd
Environment Agency
Environmental Transport Association
Federation of Small Businesses
First Group Plc
Ford Motor Company
Freightliner Group Ltd
Freight Transport Association
General Consumer Council for N.Ireland
Go-Ahead Group Plc

Greater London Authority
Greater Manchester Passenger Transport Executive (GMPTE)
Guild of British Coach Operators
Health & Safety Executive
Health & Safety Lawyers Association
Heavy Transport Association
Highways Agency
Historic Commercial Vehicle Society
HM Revenue and Customs
Home Office
Information Commissioner
Inquest
Institute of Advanced Motorists
Institute of Civil Engineers
Institute of HGV Driving Instructors
Institute of Highway Incorporated Engineers
Institute of Highways and Transportation
Institute of Mechanical Engineers
Institute of Road Safety Officers
Institute of Transport Administration
Institute of Transport Safety
International Road Freight Office (IRFO)
Law Society of Scotland
Local Authority Leaders' Boards
Local Government Association
London Assembly
London Organising Committee for the Olympic Games
Maersk Line
Magistrates Association
Marks and Spencers
Mayors Office for London
Motor Insurers Bureau
National Assembly for Wales
National Association of Agricultural Contractors
National Association of Local Councils
National Express Group Plc
National Farmers Union
National Joint Committee Young HGV Drivers
National Limousines and Chauffeurs Association
National Policing Improvement Agency
National Society for Clean Air & Environment Protection
Nissan Motor Manufacturing UK Ltd
Norbert Dentressangle (UK & Belgium)
Northern Ireland Office
Olympic Delivery Authority
Parliamentary Advisory Council for Transport Safety

Passenger Focus
Passenger Transport Executive Group
Pedestrian Association
Police Federation for England and Wales
Police Superintendents Association of England & Wales
Public & Commercial Services Union
Public Transport Consortium
RAC Motoring Services
Regional Transport Partnerships Retail Motor industry federation
Retail Motor Industry Federation
Road Haulage and Distribution Training Council
Road Haulage Association
Road Haulage Association Scotland and Northern Ireland
Road Haulage Forum
Road Operators Safety Council
Road Rescue Recovery Association
Road Roller Association
Road Safe
Road Safety Advisory Panel
Road Safety Council of Wales
Road Transport
Royal Society for the Prevention of Accidents
Scottish Courts Service
Scottish Environment Protection Agency
Scottish Executive
Scottish Motor Trade Association Ltd
Scottish Police Federation
Skills for Logistics
Society for Motor Manufacturers and Traders (SMMT)
Society of Operations Engineers (SoE)
South Yorkshire Passenger Transport Executive
Stagecoach Holdings Plc
Tarmac
The National Union of Rail, Maritime and Transport Workers (RMT)
The Pedestrian Association
The Royal Society for the Prevention of Accidents
The Scottish Road Safety Campaign
The Union of Shop, Distributive and Allied Workers (Usdaw)
The United Road Transport Union
Trades Union Congress (TUC)
Traffic Commissioners
Transport Planning Society
Trading Standards Institute
Transport for London (TfL)
UNISON
Unite Union

Vehicle and Operator Services Agency (VOSA)
Wales Community Transport
Wales TUC
Welsh Assembly Government
Welsh Consumer Council
Welsh Local Government Association
West Midlands PTE (Centro)
West Yorkshire PTE
Wincanton
Wm Morrison Supermarkets Plc