



Response from:

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THE ORGANISATION

The Motor Schools Association of Great Britain (MSA) makes the following response to DSA Consultation Document *Modernising driver training: reform of the regulatory framework for approved driving instructors*

WHO WE REPRESENT

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). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors (ILGVDI) and represent their interests together with those of potential driving instructors (PDIs) and a number of bus/coach instructors and motorcycle instructors.

HOW WE GATHERED VIEWS

In order to gather the views of MSA members details of the consultation were circulated, via the relevant chair, to all of the ten MSA committees of the regions and nations of Great Britain. Details of the consultation were published in our news magazine *Newslink* and on the associations' web site at www.msagb.com. In addition the information was transmitted to followers of the MSA on Twitter and through the MSA Facebook page. We published an indication of our intended response and invited members to comment, a number have done that and influenced this response. We have during the consultation period also held a number of members meetings at which our response has been discussed.

PUBLICATION OF MSA COMMENTS

We are content for our response to this consultation to be published by DSA.

GENERAL COMMENTS ABOUT THIS CONSULTATION

Along with other ADI associations we have been critical of the decision to have a very short period of consultation. We understand that this was because it was considered unnecessary for there to be a full length period of consultation as the ADI representatives had been closely involved with the MDT agenda from the start. Whilst our involvement with this project has been ongoing for a period approaching ten years the options shown in the consultation paper are not fully the options we had been discussing.

It is only a short time ago that we were being told that DSA officials had cleared this consultation with ministers and those proposals being finalised in preparation for formal consultation included:

- modern qualification processes and enhancement of the current DSA route and an alternative accredited qualification route – **NOT INCLUDED**
- that external verifiers would be DSA staff – **NOT INCLUDED**
- mandatory continuing professional development – **NOT INCLUDED**

In a press statement the minister said “The next step is for DSA to finalise proposals to modernise the qualification, registration and quality assurance arrangements for driver and rider trainers. The aim is to ensure minimum standards of training, mandatory continuing professional development and improved information for every learner driver”

What this consultation offers is not what we have been mainly involved in discussing. We wanted, as apparently did the minister, a package to assist the whole driver trainer profession.

- A dual entry system to the profession in order that new ideas could be tested and a measure of the success of one route against another could be considered. **We are being denied that choice.**
- An accredited qualification system backed up by DSA involvement. **We are being denied that backup which would give many in the profession confidence in a new qualification.**
- In the short term concerns about the quality of driver training is not going to be addressed by changes to the entry system we need to tackle the business of improving standards of all ADIs and we were repeatedly promised continuing professional development for all. **We are being denied that which would most assist in upping the standards of the whole profession.**

CONSULTATION QUESTIONS

Question 1: How strongly do you support the option to introduce a vocational qualification to replace the current qualifying tests (including reform of the trainee licence scheme)?

We **disagree** with option 1. We are concerned that this option would separate testing and training in a way that would not benefit road safety. Many driver trainers complain about aspects of the service provided by the Driving Standards Agency however, almost without exception, ADIs believe that the agency and their staff provide a fair and honest examination system that is linked to testing.

The proposed system in option 1 will produce a huge burden on one person trainers and micro business. This seems very unfair when we have been told that the reason for dropping compulsory CPD was because of the burden it would impose on small businesses.

In the past driving instructor training has been provided by a wide range of business from one person to large companies. Most of the evidence we believe shows that the small providers had higher pass rates fewer drop outs and better results that is why we are finding it difficult to support a system that favours some of the poorer training providers.

We are also concerned about the way in which assessment might be developed for any new qualification in driver training. The assessment route already exists for fleet driver trainers and whilst we have no desire to cast aspersions on any training bodies we are concerned that few if any of those who attend Fleet Instructor courses fail to complete the assessment.

We also note the concerns of the Education Secretary on the subject of assessment. Speaking in parliament on 11 June 2013 he said: “Both the Education Committee report and Ofqual recognise that controlled assessment, which counted for 60% of the English GCSE qualification, undermined the reliability of the assessment as a whole. It is proposed that course work and controlled assessment will largely be replaced by linear, externally marked end-of-course exams.”

With no alternative route to qualification being allowed under this option we cannot support it.

We are also concerned that breaking the link between driver training and driver testing in the way suggested would not be beneficial.

Question 2: How strongly would you support a proposal to recruit external verifiers from outside the DSA, as long as they can demonstrate an appropriate level of occupational competence and are formally qualified in the quality assurance of vocational qualifications?

We **disagree** with the proposal to recruit external verifiers from outside the DSA. When option one was being discussed by DSA with ADI consultative groups prior to this consultation it was repeatedly stated that in this option the external verifiers would be DSA staff. The revelation in the consultation document that: *"The impact assessment has explored the option of the external verifier role being performed by DSA. However, it should be noted that this option would significantly increase the costs that would have to be recovered through the qualification. It would also compromise Ofqual and the awarding organisation's ability to exercise their responsibility for quality within the academic framework."*

This confirms our view that .Option 1 which would divorce ADI testing completely from the DSA is unacceptable. We also note in this passage the comment about the academic framework. Teaching people to drive is a practical vocational skill not an academic exercise, we do not want to lose our practical training skills in favour of a system based in academia.

Question 3: How strongly would you support the option to improve the existing ADI qualification route (including reform of the trainee licence scheme)?

We **agree** with this option.

Question 4: How strongly would you support the option to make no changes other than to reform the trainee licence scheme?

We **strongly disagree** with only changing the trainee licence system. Withdrawing the trainee licence system is important and long campaigned for by the industry but it is not enough on its own.

Question 5: Do you agree that the costs, benefits and assumptions set out for each option in the impact assessment present an accurate picture?

We **disagree** we feel that many of the figures shown are at best suspect at worst confusing particularly in relation to the extra costs that will be imposed on ADI trainers who are not ORDIT members and the harm that would do their individual businesses.

Question 6: Do you believe there is any further evidence about the costs and benefits of these proposals which we should take into account?

We **agree** that cost benefit analysis is comprehensive however; we are concerned about its accuracy.

Question 7: Would you support the introduction of civil sanctions as part of the process by which the Registrar enforces compliance within the ADI registration process?

We **agree** with this proposal and have been pressing for this sanction for a number of years. We would welcome further discussion about the levels at which the sanctions should be set and

whether the amount of the sanction should vary according to the type of compliance failure and if limited suspension should be considered as a sanction alongside a financial penalty.

Question 8: Would you support the introduction of an online booking process for the standards check?

We **agree** with this proposal and have been pressing for an online booking process for the check test for a number of years.

Question 9: Would you support the restructuring of the registration fee so that the standards check is paid for separately at the time of booking?

We **agree** with this proposal **BUT** our members do have concerns that ADIs might think they are being failed in order to generate greater revenue for the regulating agency. We would want to see careful monitoring of the system to ensure fairness.

Question 10: Would you support changes to the ADI grading structure?

We would be interested in **further discussion** on this subject.

Question 11: If yes, what would your preferred structure be?

We would be interested in **further discussion** on this subject.

Question 12: What information about ADIs do you think it would be useful and fair for DSA to make available to potential consumers?

We would be interested in **further discussion** on this subject. However, we were shocked at the statement in the consultation document that stated: "Some pupils have particular needs when it comes to selecting an ADI, eg they may be looking for expertise in supporting very nervous learners."

All new learners are nervous, all driver trainers support them. This document would appear to have been written by someone who has never taught a learner to drive or they picked a very silly example.

Question 13: Do you agree that an ADI whose registration has lapsed for more than 12 months should no longer be required to re-qualify but instead undergo a standards check soon after re-registration?

We **agree** with this proposal and have been pressing for this for this "lifetime qualification" for some time.

Question 14: Do you agree that the legislation should be changed to allow the Registrar to remove an ADI from the register at their request?

We **agree** with this proposal **PROVIDING** there is a pro rata refund of unexpired registration fees.