



Response from
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1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) makes the following response to the Driving Standards Agency Discussion Paper *Introducing Hazard Perception Testing into the Driving Theory Test*.
- 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). Included within the MSA is the Institute of Large Goods Vehicle Driving Instructors (ILGVDI), and we represent their interests together with those of prospective driving instructors (PDIs) and a number of bus/coach instructors and motorcycle instructors.

2 GENERAL COMMENTS

- 2.1 We have been invited to comment on any of the issues raised in the discussion paper including the draft Regulatory Impact Assessment.
- 2.2 In order to canvass as wide a range of opinions as possible before submitting the association's views to the DSA, we invited all MSA members to comment through our monthly publication MSA Newslink. Paragraphs 1 to 36 of the discussion paper were published in full in the February 2002 issue. A further invitation to comment and the reaction of some members to the discussion paper suggestion that an HPT element should be part of the test of continuing ability and fitness to instruct (check test) were published in the March issue.
- 2.3 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.
- 2.4 Those members who attended the MSA national annual conference at the beginning of March 2002 had the opportunity to take part in an HPT trial run by QinetiQ Consulting on behalf of the DSA.

2.5 This response is laid out to approximate the reply form in appendix C of the discussion paper.

3 HOW CANDIDATES WILL TAKE HPT (paragraphs 9-11)

3.1 In general terms, we have happy with the proposals made. However, we have received some adverse comments about the use of a mouse to indicate the presence of a hazard.

3.2 Anti mouse comments:

3.2.1 The device is clearly a piece of technological hardware which may create an adverse reaction in someone who is a technophobe or simply unfamiliar with such devices.

3.2.2 Moving the mouse can cause the cursor arrow to appear on the screen which is visually interfering.

3.2.3 The shape and method of operation of the mouse may be difficult for someone unfamiliar with such devices to operate. It may also prove difficult to operate for someone with a physical disability.

3.3 Mouse alternative:

3.3.1 We suggest a button similar to that used by television weather forecasters. A cylinder with a wire from one end leading to the computer and a button at the other end. This can be operated in one hand with the button being pressed with the thumb or be held in one hand and be pressed with part of the other hand.

3.3.2 Another advantage of this type of device is that the button can be coloured thus making the push or activation point more obvious.

3.3.3 An illustration of our suggestion is attached as an annex to this response.

4 IMPLICATIONS FOR THE REST OF THE THEORY TEST (para's 13-14)

4.1 A careful watch will need to be kept to ensure that the clips used do not become outdated.

5 MARKING ARRANGEMENTS FOR HPT (paragraph 15)

5.1 A number of senior MSA members who between them have years of experience as driving instructors stated that after taking part in the HPT trial they felt that they did not understand exactly what it was they were being asked to do! Having taken the test and scored marks ranging from 38 to 60 plus none of those involved in a discussion on the subject could explain why or how they came to have a higher or lower score than colleagues.

5.2 We are concerned that if experienced driving instructors do not understand what is required then other candidates will have little chance of treating HPT as anything more than a glorified computer game.

5.3 We are reasonably convinced that HPT is a good thing for road safety but we all need to understand the marking system if we are going to make sense of it.

6 MARKING FOR THE OVERALL THEORY TEST (paragraph 16)

6.1 We are concerned that a candidate who fails on one part of the overall theory test will have to re-sit both parts. However, we have decided to support the arrangements as detailed in the discussion paper.

7 THEORY TEST FOR LORRY AND BUS DRIVERS (paragraph 17)

7.1 Yes, a higher level of competence should be required and we would like to be involved in discussions to set the pass mark.

8 QUALIFYING EXAMINATION TO JOIN THE STATUTORY REGISTER OF APPROVED DRIVING INSTRUCTORS (ADIs) (paragraphs 20-21)

8.1 Yes, a higher level of competence should be required and we would like to be involved in discussions to set the pass mark.

9 TEST OF CONTINUING ABILITY TO INSTRUCT (paragraph 22)

9.1 HPT should not be included in the test of continuing ability and fitness to give instruction.

9.2 The following comment which is an amalgamation of many of those received sums up the view of the overwhelming majority of those who responded – *Any driving instructor who has been operating for over a week must be teaching it or they would not have a car left. I would think that what we are doing is a lot harder than clicking a mouse, not only are we teaching pupils to recognise a hazard but how to cope with it as well.*

10 QUALIFYING EXAMINATION FOR LGV REGISTER (paragraph 23)

10.1 An HPT element should be part of the qualifying examination to join the register of Large Goods Vehicle (LGV) driving instructors and any other instructor registers, which may be introduced in line with the *Strategy*.

10.2 A higher level of competence should be required for instructor/trainer tests than for the drivers/riders of particular types of vehicles.

11 TRAINING STRATEGY (paragraphs 24–33)

11.1 We are encouraged by what we have seen and heard so far regarding the training strategy. However, as we stated at 5.3 above *we all need to understand the marking system if we are going to make sense of it.*

12 IMPLEMENTATION DATE (paragraph 34)

12.1 We are happy with the date suggested. However, we recall a previous DSA computer project (DTCS) that was forced through on a particular date before it was fully tested. Whilst the MSA is anxious to see HPT introduced as soon as possible we would rather see some slippage from the proposed deadline than the scheme be introduced before it is fully operational.

13 DISCUSSION PAPER LIKES AND DISLIKES

13.1 The discussion paper seemed well thought out and well put together. Our only dislike concerns the date on the cover.

13.2 Consultative bodies and interested ADIs have been kept well informed about the progress of HPT. The MSA would like to take this opportunity to place on record our thanks to Trevor Wedge, ACDE whose efforts in travelling the length and breadth of the country to talk to groups of driving instructors both small and large about HPT has been much appreciated.

13.3 Whilst we have been kept informed about progress we have had little or no opportunity to contribute to the development of HPT. Therefore we have little or no ownership of the project and still do not really understand exactly how the test will operate. This discussion paper is probably twelve months late.

14 CONSULTATION CRITERIA (Appendix E)

14.1 We feel that there are people far better qualified than us to judge whether this paper meets the Cabinet Office Code of Practice on Written Consultation. We suggest you send it to the cabinet office!

15 DRAFT REGULATORY IMPACT ASSESSMENT (RIA)

15.1 Paragraph 16 states that inclusion of HPT in the check-test for registered driving instructors is not expected to place an onerous new demand on individual instructors. We reject this statement totally.

15.2 Whilst no amount is suggested as a fee for an HPT check test it would not seem unreasonable to assume that there would be one. The instructor would also have to stand the costs incurred in attending the examination fuel, parking charges etc. In addition, the instructor would lose income through time spent carrying out this test for some, particularly those in rural areas; this could involve a considerable and significant amount of time.

15.3 We calculate that on a four-year cycle the cost to the driver training industry of including HPT in check testing would be in the region of three million pounds.

15.4 We have stated at nine above our professional objection to the suggestion of HPT on check tests we now express our business concerns at this proposed drain on resources from the ADI industry. These resources can be ill afforded and would, we feel, be much better spent on CPD.

16 PUBLICATION OF MSA COMMENTS

16.1 We are content for our reply to be included in a summary of responses, which the Agency may divulge on request.

17 CONCLUSION

17.1 The MSA support the introduction of Hazard Perception Testing into the Driving Theory Test and other driver/rider, trainer/instructor qualifying examinations. However, we do not support the introduction of HPT into ADI or other trainer/instructor check tests.

17.2 We would also like to seek assurances that DSA will ensure that driving instructors are able to fully understand what is going to be required of their pupils before they are expected to prepare candidates for the new test.