



Response from
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1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) makes the following response to the DSA Consultation Document – Fees For Driving Tests and Other Matters.
- 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). We also have a partnership with the Institute of Large Goods Vehicle Driving Instructors (ILGVDI) and 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 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 Newlink. The consultation paper was published in the June 2003 issue. In the same issue, comments on the proposals were also published.
- 2.2 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. The proposals were discussed at a recent meeting of the MSA Board of Management.
- 2.3 We are content for our response to be included in the summary of responses, which the agency may divulge on request.

3 OPENING REMARKS

- 3.1 This document proposes Part 1 (ADI Theory tests) for all existing ADIs! The response of members of the MSA to this is – “What part of **GET LOST** do you not understand and why are you wasting our time and money inflicting this on driving instructors and our money inflicting it on driving examiners?”

4 THEORY TEST FEE (paragraphs 5 - 7 of the Paper)

4.1 Do you agree with the proposal to increase the fee for a theory test by £2.50 from £18 to £20.50?

4.1.1 Tend to agree

5 FEE FOR THEORY TEST PASS CERTIFICATES (para's 8 - 10 of the Paper)

5.1 Do you agree with the proposal to increase the charge for theory test pass certificates by £2.50 from £7.50 to £10?

5.1.1 Tend to agree, but the MSA feels that the fee should apply to all tests i.e. include failures otherwise people will be prompted to apply before they are ready.

6 OTHER DSA FEES (paragraph 14 of the Paper)

6.1 Do you think the cost-recovery arrangements for the ADI scheme should include a separate fee to cover initial administrative costs when a person first applies to join the ADI Register?

6.1.1 The MSA welcomes this idea, particularly if a method can be found whereby applicants all receive a copy of the ADI 14 before they apply for examinations and, preferably, before they sign up for training courses.

7 VEHICLE SAFETY CHECKS IN DRIVING TESTS FOR LEARNERS DRIVING SPECIALIST VEHICLES (paragraphs 16 - 17 of the Paper)

7.1 Do you agree with the proposal to include basic vehicle safety checks in driving tests taken for specialist vehicle categories, in line with higher European standards for driving tests?

7.1.1 Tend to agree

8 THE QUALIFYING EXAMINATION FOR PROFESSIONAL DRIVING INSTRUCTORS (paragraphs 18 - 20 of the Paper)

8.1 Do you agree with the proposal that the multiple-choice question element in the qualifying examination for professional instructors should be enhanced in line with higher European standards for driving tests?

8.1.1 Tend to agree

8.2 Do you agree with the proposal to include basic vehicle safety checks in the practical qualifying test for professional instructors, in line with higher European standards for driving tests?

8.2.1 Tend to agree

9 EXTENDING HAZARD PERCEPTION TESTING (HPT) TO EXISTING ADIs (paragraphs 21 - 30 of the Paper)

9.1 Do you think HPT should be part of the standards supervision arrangements for existing ADIs?

9.1.1 No. Our response remains unchanged from that given about a year ago. HPT should not be included in the test of continuing ability and fitness to give instruction.

9.1.2 We made the comment that: Any driving instructor who has been operating for over a week must be teaching it or they would not have a car left. What we (ADIs) 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.

9.1.3 To require experienced ADIs to take part in what many people describe as a computer game is an insult to the profession.

9.2 Do you think the computer-based test for registered instructors should include a multiple-choice question element?

9.2.1 No. In what other professions are, participants required to re-sit the qualifying exam every few years? This suggestion is just an easy way for DSA to try and catch up on its lamentable record over recent years in conducting practical check tests.

9.2.2 The way that it has continued to collect ADI fees without delivering a service is reprehensible. To try and hide its deficiencies behind HPT testing is sad.

9.3 Should the pass-mark for a HPT element for registered instructors be the same as for instructors who are qualifying for registration?

9.3.1 As stated using the qualifying exam to test existing instructors is an insult. We are unaware of any other profession where this practice is used and consider it to be a deplorable idea.

9.4 Do you think ADIs should be allowed up to three attempts at a computer-based test?

9.4.1 No comment.

9.5 Do you think a proposed computer-based test should be in addition to, or a substitute for, the existing check-test?

9.5.1 There should certainly be no additional burden placed on hard-working ADIs and to suggest that clicking a mouse could substitute for a proper test of practical teaching skills is laughable.

9.6 Should ADIs be required to satisfy a computer-based test every four years to remain on the Register (in addition to any other check testing?)

9.6.1 Absolutely not. The purpose of the ADI register is to provide the public with an assurance of quality of driver training.

9.6.2 The public does not want to know if an instructor can click a mouse at the right time, they want to know if the ADI concerned is capable of giving quality driver training and is of good character.

9.7 Do you think ADIs should pay a specific fee for each check-test, or a fee should be paid only for attempts after the first one?

9.7.1 Regarding “traditional” check tests the MSA has suggested for some time that second and subsequent attempts at the test should be paid for to avoid penalising those who pass first time. Whether the first check test is charged for or included in the registration fee is academic.

9.8 Do you have any other suggestions for improving ADI check-tests?

9.8.1 Here’s a revolutionary idea for DSA to consider. How about conducting some!

9.8.2 We also suggest the replacement of some check tests on the basis of satisfactory completion of properly accredited CPD training.

9.9 What is the best way to extend HPT to existing registered instructors in non-statutory schemes? (paragraph 30 of the Paper)

9.9.1 Non-statutory schemes should reflect statutory schemes.

9.9.2 It is perhaps worth taking this opportunity to remake the point that all registered instructor schemes, statutory and non-statutory, should take account of pre-existing qualifications.

10 MODERNISING THE YOUNG LGV DRIVERS SCHEME (para’s 31 - 33)

10.1 Do you agree with the proposal to require trainees to surrender their lorry driving licence when leaving the Scheme before completion?

10.1.1 Tend to agree

10.2 Do you agree with the proposal to require trainees to present evidence to examiners that they had progressed to the appropriate stage in their training programme?

10.2.1 Tend to agree

10.3 AMENDED DATES CONCERNING THE IMPLEMENTATION OF HIGHER EUROPEAN STANDARDS FOR DRIVING TESTS (paragraphs 34 - 37 of the Paper)

10.4 Do you agree that it would be desirable if the “first use” date for vehicles for the purposes of their meeting the higher MTV standards was set later?

10.4.1 Tend to agree

10.5 Do you agree that it would be desirable if Member States had until 2008, rather than 2005, to implement the new specific manoeuvres in the motorcycle test?

10.5.1 Tend to agree

11 DRAFT REGULATORY IMPACT ASSESSMENT

11.1 The consultation document contains a number of appendices including a report on consultation regarding the young LGV driver scheme Regulatory Impact Assessment (RIA) for HPT for ADI check tests and various other matters.

11.1.1 Regarding the Draft Regulatory Impact Assessment concerning HPT for ADI check tests the MSA would point out that they **fail to take account of the points we raised last year** regarding the costs that would be placed on individual instructors by an HPT check test.

11.1.2 The consultation document suggests a fee of £50 for the test but fails to take account of the ADIs loss of earnings, travel and subsistence costs. Last year we estimated that these would be in the region of £3M.

11.1.3 Because of this consultation paper, we have done further work on the cost of this exercise to the driver training industry. We calculate that on average an instructor would lose about three hours of driving lessons and incur travel and subsistence costs including car parking.

11.1.4 In addition to time lost to take the test they would need to prepare for the test and a reasonable estimate might be about half a day revision or training resulting in the loss of a further four hours tuition.

11.1.5 For those wishing to take training we estimate that the cost of a half day training course would be between thirty and fifty pounds.

11.1.6 The chart below shows what we believe is a reasonable estimate of the cost of HPT testing to individual ADIs.

Element	Cost
Loss of three hours tuition in order to take the test (Includes travelling time) plus four hours tuition for revision/training 7hours @ £20 per hour	140.00
Miscellaneous expenses travel & subsistence etc.	20.00
Cost of half a days training say £40	40.00
Total	200.00

11.1.7 If this cost were reflected across the whole ADI register, and it should be noted it takes no account of re-tests for any one unfortunate enough to fail HPT, it would double our initial estimate cost to the industry and suggests a figure of around £6 million.