



Response from
The Motor Schools Association of Great Britain
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1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) makes the following response to the proposals to modernise the arrangements for taking driving tests.
- 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). Following our merger with the Institute of Large Goods Vehicle Driving Instructors (ILGVDI), in 2000, we also represent their interests together with those of a number of bus/coach instructors and motorcycle instructors.

2 GENERAL COMMENTS

- 2.1 In order to collect as wide a range of views as possible before submitting the association's views on the consultation document to the committee, we invited all MSA members to comment through our monthly publication *MSA Newslink*. 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.

3 RESPONSE

- 3.1 The following responses are numbered as in the consultation questionnaire.
 - 1 The proposal is to introduce a Trainer Booking Facility for instructors to reserve appointments for car theory tests. Do you agree? Yes, we agree with the proposal with the reservation that we have always held regarding trainer bookings that large multi instructor schools are not allowed to dominate bookings.
 - 2 The proposal is to reduce from 10 to three clear Working Days the minimum period of notice which candidates must give DSA to cancel or re-arrange a practical test appointment without a loss of fee. Do you agree? Yes, we agree with the proposal, considering that we have been calling for its reintroduction since you (DSA) scrapped it some years ago we are hardly likely to object.
 - 3 The proposal is to reduce from 10 to 3 clear Working Days the minimum period of notification which DSA must give candidates to cancel or re-arrange a practical test appointment without paying out-of-pocket expenses. Do you agree? No, we do not agree with this proposal a large organisation like the DSA should be able to guarantee all bookings it makes and pay compensation whenever it cancels them.
 - 4 The proposal is to reduce from 10 to three clear Working Days the minimum period of notification which candidates must give DSA to cancel or re-arrange a qualifying test appointment taken as part of the Register of Approved Driving

Instructors and the voluntary registers operated by DSA without a loss of fee. Do you agree? Yes, we agree with the proposal.

- 5 The proposal is to reduce from 10 to 3 clear Working Days the minimum period of notification which DSA must give candidates to cancel or re-arrange a qualifying test appointment taken as part of the Register of Approved Driving Instructors and the voluntary registers operated by DSA without paying out-of-pocket expenses. Do you agree? No, we do not agree with this proposal see 3. Above.
- 6 The proposal is to reduce the minimum Notification Period for supplying DSA with candidate /vehicle details for practical tests within the Trainer Booking Facility to 16:00 hrs, one clear Working Day before the test. Do you agree? Yes, we agree with the proposal but have some concerns about “wasted tests” even though the Trainer Booker pays for them. We are concerned that not too many tests are “wasted” and hope DSA will monitor “wasted tests” and withdraw trainer-booking facilities from those who abuse the system.
- 7 The proposal is to reduce the minimum Notification Period for supplying DSA with candidate /vehicle details for theory tests within the Trainer Booking Facility to 16:00 hrs, one clear Working Day before the test. Do you agree? See 6
- 8 The proposal is to count Saturday as a Working Day for the purposes of the minimum wait before unsuccessful theory and practical test candidates may re-attempt the test. Do you agree? Yes, we agree with the proposal Saturday has long been a working day for ADIs. As DSA are now testing on a Sunday why not include that as a working day as well?
- 9 The proposal is to count Saturday as a Working Day for the purposes of calculating the minimum period of notification for a candidate to cancel or re-arrange a theory or practical test without fee forfeiture. Do you agree? Yes, reasons as 8.
- 10 The proposal is to count Saturday as a Working Day for the purposes of calculating the minimum period of notice for a candidate to cancel a test taken as part of joining the Register of Approved Driving Instructor and the voluntary registers operated by DSA without fee forfeiture. Do you agree? Yes, reasons as 8.
- 11 The proposal is to count Saturday as a Working Day for the purposes of the notification period for supplying candidate/vehicle details for tests within the Trainer Booking Facility. Do you agree? Yes, reasons as 8.
- 12 The proposal is to improve the photographic ID procedure at theory and practical tests by requiring candidates to present a Photocard Driving Licence. Do you agree? Yes, we agree with the proposal. Identity fraud is clearly a growing problem and we support all efforts to prevent it.
- 13 The proposal is to phase out the use of D441 (Certificate of Entitlement) as evidence of entitlement to drive for theory and practical tests. Do you agree? Yes, we agree with the proposal for the reasons stated at 12.
- 14 The proposal is to specify that candidates holding a photocard style driving licence issued by another EU Member State must, in addition to the licence counterpart issued by DVLA, produce their EU driving licence to satisfy the photographic ID requirements at theory and practical test. Do you agree? Yes, we agree with the

proposal for the reasons stated at 12.

- 15 The proposal is to adopt the same arrangements for candidates to produce Photocard Driving Licences at theory and practical tests taken as part of the qualifying examination or check-test for the Register of Approved Driving Instructors and the other voluntary registers operated by DSA. Do you agree? Yes, we agree with the proposal for the reasons stated at 12
- 16 Do you consider the proposed conditions for authorisation as a translator at a theory test to be appropriate? Yes, we agree with the proposal for the reasons stated at 12
- 17 Do you consider the format of the Photo ID card to be issued to DSA authorised theory test translators to be appropriate? Yes, we agree with the proposal which seem reasonable.
- 18 The proposal is to reduce the period of authorisation for a theory test translator to 12 months. The authorisation may be withdrawn if any of the conditions specified in paragraph 39 cease to apply. Do you agree? Yes, we agree with the proposal.
- 19 The proposal is to make a list of DSA authorised theory test translators publicly available from the theory test booking service, DSA headquarters and on the DSA website. Do you agree? Yes, we agree with the proposal.
- 20 The proposal is to consider if further safeguards should be introduced for translators on practical tests eg should persons acting as translators be restricted to 'authorised translators' only. Yes, we agree that there should be further safeguards introduced for persons acting as translators on practical tests
- 21 The proposal is to require vehicles presenting for car-plus trailer, lorry and bus tests to be fitted with externally-mounted nearside and offside mirrors for use by the examiner. Do you agree? Yes, we already have members who fit these and find them satisfactory.
- 22 The proposal is to require vehicles presenting for practical tests of driving ability taken by persons wishing to join DSA's non-statutory registration scheme for LGV driving instructors to be fitted with externally mounted nearside and offside mirrors for use by the examiner. Do you agree? Yes, see 21.
- 23 The proposal is to require vehicles presenting for lorry tests to be fitted with a two or three-point seatbelt for use by the examiner and, where a third seat is available, the person supervising the examiner. Do you agree? Yes, we believe this is already required under Health and Safety guidelines.
- 24 The proposal is to require vehicles presenting for practical tests of driving ability taken by persons wishing to join DSA's non-statutory registration scheme for LGV driving instructors to be fitted with a two or three-point seatbelt for use by the examiner and, where a third seat is available, the person supervising the examiner. Do you agree? Yes, see 23.
- 25 The proposal is to require vehicles presenting for bus tests to be fitted with a two or three-point seatbelt for use by the examiner and any person supervising the examiner. Do you agree? Yes, see 23.

- 26 Do you agree that the problem of poor seating in large goods vehicles presenting for test should resolve itself as more modern vehicles are increasingly used for test as a consequence of the new EU standards for test vehicles or is further action appropriate? Yes, we consider the problems of poor seating will be overcome as more modern vehicles are used for test purposes.
- 27 The proposal is to introduce an express provision covering the presence of a member of DSA quality control team supervising an examiner conducting an ADI practical qualifying test or check-test. Do you agree? Yes, we agree with the proposal and were somewhat surprised that such provision did not already exist.
- 28 The proposal is to allow more flexibility in the driving experience requirement for those accompanying learners driving lorries and buses. Do you agree? Yes, we agree with the proposal.
- 29 The proposal is to allow persons with a physical disability to supervise learners driving lorries or buses and vehicle-trailer combinations where this does not present any road safety risk. Do you agree? Yes, we agree with the proposal.
- 30 The proposal is to allow theory test invigilators and driving examiners to seize driving licences where fraud is suspected. Do you agree? Yes, we agree with the proposal.
- 31 The proposal is to enhance the candidate declarations on the practical test documentation to include insurance, health and residence requirements. Do you agree? Yes, we agree with the proposal.

4 PUBLICATION OF MSA COMMENTS

- 4.1 We are content for our response to be included in the summary of responses, which the agency may divulge on request.