

DSA Consultation Paper:  
Introducing a Register of Fleet Driver Trainers

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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 Paper: Introducing a Register of Fleet Driver Trainers
- 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 The MSA fully support the principal of fleet driver training we would like to see all drivers, not just those who drive on business, required to undertake retraining on a regular basis and we support in general terms the provision of further training and qualifications (CPD) for ADIs.
- 2.2 However, we are concerned that the proposals in this consultation document do not attempt to specify exactly what the term “fleet driver training” means. In the past, the DSA initiated a discussion about the definition of “advanced training” that was unresolved. If fleet training is to be considered any training beyond the learner-driving test we wonder where for instance does place Pass Plus fit in.
- 2.3 We are also concerned about those instructors who already undertake training in the company/fleet driver training market. Many of these have developed considerable expertise in their own right. We are concerned that these already expert trainers may be required to take additional qualifications at considerable cost in order to be allowed to continue doing that which they already do to a high standard.
- 2.4 We suggest that any ADI who can demonstrate that they have carried out a certain amount of a company/fleet driver training over a prescribed period, perhaps a one hundred and fifty hours over the previous twelve months may be admitted to the register by passing a fleet check test.

### 3 NATURE OF THE QUALIFYING EXAMINATION

#### 3.1 THEORY TEST

3.1.1 We are concerned that some of the items under consideration are duplications of the ADI theory test. We would also assume that any future hazard perception test would be ordered in such a way that it would present a stiffer challenge than the “L” or ADI test

#### 3.2 DRIVING TEST

3.2.1 We are concerned that this test apart from the commentary is as the ADI driving test marked to a slightly higher standard. A standard that a large number of ADIs will have already reached on their ADI Part 2 examination, we assume that they do not all receive the maximum number of faults currently allowed!

3.2.2 The consultation document makes it clear that *Those who provide professional instruction for driving cars and vans up to 3.5 tonnes (vehicles in category B) must be Approved Driving Instructors (ADIs) on the statutory register maintained under Part V of the Road Traffic Act 1988 by DSA.* This implies that those on the fleet register would be qualified to give training in all vehicles in category B. Most ADIs only drive the cars they give tuition in these are usually relatively small cars under 1.6 L. However, the majority of cars in the fleet market are larger in size and engine capacity than these.

3.2.3 We are also aware that the “Work Related Road Safety Task Group” is concerned as much about van drivers (white van man) as they are about car drivers. Many driving instructors may have never driven a van and few will do so on a regular basis. We would like the DSA to indicate how they intend to ensure that fleet trainers have experience of driving different types of vehicle particularly large high-powered cars that often have features not present on smaller cars. We would also like DSA to indicate how they will ensure that fleet trainers can demonstrate safe driving in vans with no rear or side windows.

3.2.4 A number of members have expressed concerns that the consultation document states *that during the practical drive, an instructor would have to demonstrate competence in ~ an environmentally friendly driving style.* They suggest that this is incompatible with advanced driving which is the style of driving taught by some of the major fleet training companies.

### 4 LOCATION OF PRACTICAL TEST CENTRES

4.1 We note that the proposed location of practical test centres is the existing network of ADI test centres. In view of the DSAs inability to offer an efficient service for testing PDIs and check testing ADIs. We suggest that the agency recruits experts from the industry to conduct the fleet register examinations therefore avoiding the burden of training and extra examinations being placed on an already over stretched work force.

## 5 ACCREDITED TRAINING PROCESS FOR FLEET INSTRUCTORS

- 5.1 The MSA is concerned that time limit mentioned in paragraph 18 of the consultation document states *provide documentary evidence from the appropriate training organisation that an approved course had been successfully completed within the 12 months preceding the date of application.*
- 5.2 We are concerned that a growing number of ADIs have taken fleet driver training courses recently. Assuming that the register will take a little time to set up, we feel that restricting their registration period to one year could mean disenfranchising a large number of ADIs who have paid for and taken training in good faith.
- 5.3 We feel the figure should perhaps be four years and those who took training prior to that time could perhaps be required to take some refresher training rather than a full course.

## 6 SUPERVISION ARRANGEMENTS

- 6.1 We repeat the point made above that the agency should consider recruiting experts from the industry to conduct the fleet register check tests.

## 7 REGISTRATION

- 7.1 We would recommend that for the sake of simplicity an instructor's fleet registration should run concurrently with their ADI registration and that new entrants to the fleet register should pay a proportion of that fee to take them up to the renewal date for their ADI registration.

## 8 PUBLICATION OF MSA COMMENTS

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

## 9 CONCLUSION

- 9.1 Whilst supporting wholeheartedly the registration of instructors for the various road transport disciplines we are becoming increasingly concerned that they are becoming somewhat disparate. We feel that there should be a register of DSA driver/rider trainers with some core qualifications shared amongst the different disciplines allowing accreditation of prior learning and restricting the costs to those instructors who wish to work in different sectors.
- 9.2 We recall that the initiative for a register of fleet driver trainers was launched with a meeting of interested parties. We strongly recommend that all those parties be invited back for a progress report and discussion before any final proposals are presented for ministerial approval.