



Response from

The Motor Schools Association of Great Britain

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January 2007

1 INTRODUCTION

- 1.1 The Motor Schools Association of Great Britain (MSA) makes the following response to the DSA Consultation Paper: Service Improvements, Safety Related Measures & General Fee Increases
- 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 *Newslink*. Brief details of the consultation paper were published in the November 2006 issue. Under the following headline and introduction we listed the consultation proposals.
 - More consultations from the DSA*
 - In September we reported on a consultation workshop DSA had held as part of its preparation for the Government's review of its Road Safety Strategy. DSA have published a consultation document containing a number of service improvement, safety related and fee increase proposals. Below are details of all the proposals that are covered by the consultation. Details are on the DSA website, www.dsa.gov.uk. The November issue of Newslink will contain MSA reaction to this consultation. In the meantime, if you have any views on this consultation, please contact MSA head office.*
- 2.2 On page 11 of the December issue of *Newslink* we ran the following headline and introduction with a draft response.
 - Draft response to DSA consultation*

□ *Below is the MSA draft response to the proposals in the DSA consultation paper Service Improvements, Safety Related Measures & General Fee Increases. The paper can be read or downloaded from the DSA web site www.da.gov.uk The draft responses below have been devised from various sources including the feed back received from the request for comments in the November Newslink. If you wish to add a comment or you disagree with any of the responses listed please contact MSA general manager John Lepine and let him know your views. The final version of the MSA response will be published in January.*

- 2.3 Feedback from the first article informed our draft response and further feedback from the draft has informed this final response.
- 2.4 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 and their comments have further informed this response.
- 2.5 The responses below are laid out as the questions are asked in the consultation document. The MSA replies are in ***bold italics***.
- 2.6 We are content for our response to be included in the summary of responses, which the agency may divulge on request.

3 RESPONSE

Proposal 1: Investigate allowing road freight companies to undertake lorry driving tests for their staff. ***MSA Response – Undecided see our response to proposal 12 below.***

Proposal 2: Reduce the minimum wait following unsuccessful practical tests for cars and vans towing trailers. ***MSA Response - In favour***

Proposal 3: Introduce fairer cost recovery arrangements for 'in house' theory tests. ***MSA Response - In favour***

Proposal 4: Conduct criminal history checks for ADIs and recover associated costs via the fee for the theory test taken as part of the ADI qualification process. ***MSA Response - In favour provided due weight is apportioned to the severity of the convicted offence and providing examiners are subjected to similar scrutiny.***

Comments on longer-term arrangements to recover the costs of undertaking regular CRB checks ***MSA Response - In favour of the proposals made.***

Proposal 5: increase in stages the number of questions in the theory tests taken by learner lorry and bus drivers. ***MSA Response - In favour***

Proposal 6: Introduce an additional ten minutes driving time to bus, coach and lorry tests from September 2008. ***MSA Response - In favour***

Proposal 7: Restrict the use of panel vans and soft-top convertibles as types of vehicles which may be used for practical car driving tests as per option 4 of Annex A2 (i.e. early amendment of legislation requiring an adequate field of vision) ***MSA Response - In favour. However, a number of MSA members have drawn attention to what they perceive as the somewhat ironic stance of the DSA concern over health and safety issues regarding visibility, which they understand, contrasted with the agency allowing category B vehicles, without dual controls, to be used on driving tests.***

Proposal 8: Increase the price of The Highway Code and promote its use amongst the general public ***MSA Response - In favour, provided the extra revenue is used to promote road safety and the code continues to be available on line F.O.C.***

Proposal 9: Increase the number of questions in the theory tests taken by car drivers motorcycle riders. ***MSA Response – Opposed. We see little point in increasing the number of multiple choice questions to fifty. These questions only seem to validate knowledge they do not test a learners understanding. Increasing the difficulty of the test would be fine if compulsory theory tuition was introduced which might mean some understanding of the subjects tested could be taught.***

Proposal 10: Introduce quality assurance arrangements for Approved Training Centres and courses for Periodic Training for professional drivers of buses, coaches and lorries. ***MSA Response - In favour***

Proposal 11 (i): Recording CPC status using Driver Qualification Cards. ***MSA Response - In favour***

Proposal 11 (ii): Recovering costs of issuing DQCs with a £25 fee. ***MSA Response - In favour***

Proposal: 12: Improve the initial training for delegated examiners authorised to conduct practical driving tests for learner bus and coach drivers. ***MSA Response – Undecided Opinion on this seems very divided some think it right to have better training for delegated examiners and are in favour of delegated examiner schemes providing test are properly and regularly supervised by DSA others feel that all delegated examiner schemes should be scrapped as they have the ability to erode the high standards set by DSA examiners.***

Proposal 13: Introduce a requirement for a driving test candidate to surrender, in certain circumstances, a driving licence to the theory test invigilator or practical test examiner. ***MSA Response - In favour. Examiners should have the legal power to confiscate a suspect driving licence. They may also need martial arts training to protect their personal health and safety.***

Proposal 14: Increase the fees for the practical motorcycle/moped test. ***MSA Response - Opposed we believe the test fee should be increased more in order to cover the full cost of this type of test and the centres to conduct them. Alternatively, government funding should be provided, the practice of car tests subsidising bike tests should be stopped.***

Proposal 15: Increase the fees for the practical tests taken as part of the ADI qualification process. ***MSA Response - In favour. Providing the fees reflect the costs and are not increased to subsidise the cost of new test centres.***

Proposal 16: Increase the charges for the non-statutory instructor registration schemes operated by DSA. ***MSA Response – Opposed. It is stated that there are 1,300 people on the Fleet Register most of who gained entry by ‘grandfather rights’. Only 33 qualification tests were taken in the year 2005/06 and presumably not all those who took the test passed, therefore as people retire the number on the register will reduce as time passes. One way of ensuring that this will happen more quickly is to increase the registration fee by 100%. We hoped that the introduction of an integrated register would reduce fees for “extra” registrations and we feel that until an integrated register of instructors is introduced fees should only be increased by modest amounts in order to encourage participation in the voluntary schemes.***

Proposal 17: Increase the charges for Taxi and Private Hire car tests. ***MSA Response - In favour. Providing the fees reflect the costs and are not increased to subsidise the cost of new test centres.***

Proposal 18: Increase the charges for Pass Plus products. ***MSA Response - In favour. Providing the fees reflect the costs and the service standard provided is kept at a high level. Past history of the administration of Pass Plus has been unsatisfactory. Any increase in fee must be used to ensure service levels are not allowed to decline again.***