

**Extract from:**

**Change Board on 12 February 2010**

**EU Third Directive Business Case**

It was clarified that for DSA examiners there is no change to initial qualification or for non DSA examiners when they were trained by DSA. There are new obligations for DSA as regards Periodic Training, and for non DSA examiners.

The adaptation and re engineering of existing periodic training to meet with the Directive at no extra cost is currently underway.

**AP: PB to liaise with TW in relation to the adaptation and re engineering of existing training to meet with the Directive at no extra cost.**

The Board suggested that:-

- Adaptation and re engineering of existing training to be given further in depth consideration.

**Extract from:**

**Progress on key projects report of the sponsorship board paper agenda item 2.3**

EU Third Directive –

Work to complete a gap analysis of examiner training against the requirements of the Directive is on-going

Gap analysis of examiner training to be reviewed early October and consideration given to any options for satisfying the requirements of the Directive.

**Extracts from:**

**EU 3<sup>RD</sup> DIRECTIVE: MINIMUM STANDARDS FOR PERSONS WHO CONDUCT PRACTICAL DRIVING TESTS**

**NOTES FROM MEETING WITH DELEGATED ORGANISATIONS ON 24/11/10 AT DSA TRAINING CENTRE, CARDINGTON**  
**Periodic Training - Driving Skills**

The preferred option by DSA is that Delegated organisations provide their own courses for periodic training to cover the minimum 5 days per 5 year period for Driving Skills. Most organisations were comfortable with this. The following points were clarified on this option:

- Each organisation would maintain its own records of the periodic training supplied and provided that it meets the requirements of the EU 3<sup>rd</sup> Directive this would be acceptable.

- DSA would not accredit any of the Delegated organisations in house courses but would provide guidance on suitability. Some organisations commented that the Directive was not strict or rigid on the training content that was acceptable. DSA pointed out that in the current economic climate this flexibility was favourable.
- JAUPT accredited courses would equally be acceptable as long as the content was appropriate. If an organisation wished to use its CPC course towards the periodic training it would need to include the required elements such as eco-driving.
- EFAD & PNS assessments should also fit as periodic training.

Other concerns/comments from Delegated organisations were:

- Driving examiners/instructors would be training each other on in house courses
- Some of the elements in the competencies would not be covered by their own courses
- A preference for cross border/cross sister company training rather than in house training

DSA can deliver periodic training through a course delivered at Cardington. A few delegated organisations expressed an interest in this but this was the minority. DSA expects to be able to offer this option on a limited basis and will make arrangements clear in due course.

Delegated organisations have a responsibility to ensure they comply with the periodic training. However, DSA would be happy to answer any queries about the appropriate training and to work with Delegated organisations to support them to this end.

There was a further option suggested that DSA make available to Delegated organisations the content of their own periodic training courses and this will then be delivered by the Delegated organisations themselves. DSA will consider this. It is not in a position to share any training content until the course has been designed.

### **Periodic Training – Examiner Skills**

The consensus of both sessions was that half of this periodic training would be satisfied through sector manager visits and half through training delivered by delegated organisations.

Delegated organisations will need to take responsibility to arrange their own check tests when the directive is implemented. This is part of the responsibility they will need to assume to ensure they are compliant.

Delegated organisations have access to in house or third party courses, such as Customer Care, First Aid which satisfy the directive. As with driving skills training delegated organisations will need to make sure that examiners can evidence such training, for example through some form of portfolio. This can then be viewed through Sector Manager visits. It will also form the basis of a self declaration that compliance with the directive is being maintained when annual re-registration takes place.

Some elements of Driver CPC may overlap into the examiner skills periodic training.  
Any Other Business

- Whether there was any link between the Directive's periodic training requirements being satisfied and the minimum test figure being reached. It was clarified that there was not but in effect both have to be satisfied in their own right.

There was agreement that there was no need for a further meeting prior to the implementation of the Directive. There was a suggestion made that such a meeting would be appropriate in the 12 months following implementation to enable ideas to be shared and any concerns to be addressed.

**Extract from:**

### **Third Directive Programme Board 16 November 2010**

DVLA/DSA project manager's update.

Redacted Section 40 (2)/ David Shepherd

DSA – a proposal for handling examiner training will be presented to the project board on 2 December and a meeting with delegated examiners to discuss how they comply with the Directive is to be held shortly

**Extract from:**

### **Third Directive Project Board meeting on 22 January 2010**

The driver examiner CPD training was shown to cost £7.8m, equivalent to an extra 3 days periodic training per examiner annually (assuming no significant associated property costs) which will bring the cumulative financial position of a £5m deficit. Funding the deficit could be a problem owing to no fee increase. The only way would be by finding efficiency savings elsewhere in the Agency.

The Board was informed that if the examiner periodic training element can be reduced to c£2.5m, equivalent to merely one extra day examiner training annually, then the project could break-even. The Board agreed that it was too early to decide on the training operational cost. TT informed that work is on-going in that area, and would take 2-3 months before she can report back to the Board.

The Board decided that the “best case” assumption was a robust assumption and should be included in the Outline Business Case, provided it is supported with a clear text which should also be included in the Executive Summary. The low cost scenario would adopt the lower figure for examiner periodic training. [AP03: Redacted Section 40 (2) and Redacted Section 40 (2) to do the needful]

**Extract from:**

### **Third Directive Project Board meeting on 24 February 2010**

The Change Board was concerned that the project had under-estimated the difficulties using SSC to log periodic training undertaken by examiners. Redacted Section 40 (2) assured that he was content with the business as usual assumption that was made for “recording & evidencing of system changes” on SAP.

The Change Board challenged whether SSC or any other system could offer a cheaper option for recording examiner training. **PB** advised that Andrew Beveridge had told him that all training must be recorded on SSC. **TT** commented that there may be cost benefits for using different systems recording the two types of mandatory training, particularly if DSA intended to define activities (like check tests) as periodic training where those activities were already recorded on TARS. **[AP04: Redacted Section 40 (2) to circulate the note of the meeting which took place with Andrew Beveridge].**

**TT** warned the Project Board that whilst Change Board seemed to have focused on whether existing training could be redefined to constitute periodic training, and issues of recording systems, there did not appear to be recognition on the quantity gap between the amount of in-service training that DSA aspired to provide and the amount that was actually provided. This meant that there was probably a wider volume gap, and therefore incremental cost implication in implementing the Directive in terms of examiner training. This was likely to be a bigger ticket item than whether to record training on SAP or TARS. **TT** agreed to brief Brian Gilhooley and prepare a paper on gap analysis by end of March. The paper would also include recording issues **[AP05: TT to produce a paper to the Project Board by end of March.]** Redacted Section 40 (2) will start planning milestones on update for SAP once analysis of training and recommendations have been accepted

**LY** queried DSA's approach to offering periodic training to Delegated Examiners. She indicated that this would be welcomed. DSA could provide the service on a cost-recovery basis. **PB** queried whether this was in project scope. If it was then it should be included in Business Case. **TT** noted that DSA appeared to be making a better planned offer to delegated examiners than to our own staff. Redacted Section 40 (2) commented that the quality assurance arrangements for training indicated a responsibility for each member state to ensure training has takes place and is appropriate. On this basis the Project Board decided that DSA resources required to conduct Delegated Examiner training should be estimated. **[AP10: TT to consider in training analysis the impact of offering DSA training to Delegated Examiners]** **PB** asked Redacted Section 40 (2) to work with Redacted Section 40 (2) to make sure Delegated Examiner issues were covered in the Comms Plan

**Extract from:**

### **EU Third Directive Project Board 20 July 2010**

The highlight report was reviewed. It was reported that a detailed gap analysis was underway for the three types of warrant card held by those entitled to conduct tests:

- i. All DSA Driving Examiners, Senior Driving Examiners and Supervising Examiners
- ii. ACDEs and above
- iii. Delegated Examiners

It was confirmed that the responsibility for performing the gap analysis on the four areas required by the Directive had been allocated to:

- i. Initial qualification - Learning & Development,
- ii. Periodic training driving skills - Learning & Development and Standards & Regulations
- iii. Periodic training examiner skills - Testing & Assessment
- iv. Quality assurance - Standards & Regulations

and three workshops have been planned for September, October and November 2010 to complete the detailed gap analysis. Once the analysis was completed the work stream would propose options for addressing any gaps.

It was reported that a workshop was to be arranged with the decision makers for delegated examiners to discuss the approach for ensuring delegated examiners complied with the Directive. At a meeting in 2008 delegated examiners had expressed a preference for DSA to provide the training; this has to be validated with the decision makers at those organisations. It was noted that many of the delegated examiners worked for organisations that were accredited to deliver Driver CPC periodic training. This could provide a route for assuring any training they delivered internally was of an appropriate standard and that they had the ability to deliver the training.

It was reported that the LGV/PCV examiner course was currently being put through the process to be accredited at NVQ level 3 to bring it in line with the car new entrant course. This would have the benefit of ensuring delegated examiners met the requirement to hold a qualification at level 3.

It was noted that Northern Ireland did not have delegated examiners.

#### **Extract from:**

#### **Examiner Workstream Meeting 10.30-11.30, Rm 3.08, 14<sup>th</sup> May 2009**

#### **Workstream Plans**

The need to identify formats of training, those who will be responsible and when it will be delivered will be essential for managing expectations and breaking down into manageable pieces of work. TT wanted this work to start in earnest **after** consultation, in case consultation veered towards test or training only.

TT presented the idea of offering a personalised training package based on examiner requirements - training therefore relevant to the individual, eg. five days' training split between lorry, bus and bike.

#### **Extract from:**

#### **Test and Training Update 19 August 2009**

#### **Examiner Update 20 August 2009**

#### **Update Risks**

3D35 include mitigation that design work for test and examiner training to start in September

#### **Identification of**

- Record issue. TT queries if delivery of examiner periodic training in a modular fashion is appropriate (as challenged with Driver CPC 35 hours). Closed as legal advice has proposed that as long as training is meaningful and offers development the definition allows a modular approach to periodic training which should be acceptable.

#### **Extract from:**

## EU 3<sup>rd</sup> DIRECTIVE Examiner Workstream 10 February 2010

Discussions ensued on the Examiner Periodic Training – Options for delivery paper.

- Need to establish what the level of training is required especially for recording and to enable where the training is to be coordinated and who provides it.
- Further consideration regarding benefits for the training being centralised, or spread throughout the country.
- A review of the training currently provided is required to be able to establish if any of it can cover off the requirements under the Third Directive and establish a baseline against the required number of days to see if zero increase in days is feasible.

**AP: A forum is required to ascertain just what the Directive states in terms of 'improving the driving skills', actually means in terms of providing training. Redacted Section 40 (2) to take forward.**

- It may necessitate seeking advice from Policy branch just what content/level the training should include.
- Finance section is to investigate the costs for providing the training at MPTC in comparison with central sites.
- It is envisaged that the training will be geared to cover all grades and warrant card holders who provide practical tests for licence acquisition/upgrade.

**AP: BY will supply details of training currently provided by Cardington, and the number of candidates attending each strand of training, to Redacted Section 40 (2) by 17 February 2010.**

- Must ensure that we do provide the type of training required, and we are not just ticking the 'boxes' to cover the EU Directive.
- Work Stream advocate that we establish what training other EU member states (i.e. Sweden, Finland, and Holland) are providing at present; and in their endeavour to meet the EU Directive.

**AP: Redacted Section 40 (2) is to put together a document highlighting different scenarios in relation to costs vs. training.**

- Conferences for examiners could become dedicated training/conferences, and count towards the number of days required for compulsory training under the Third Directive.
- The question of TUS involvement in the planning of the training was raised, Redacted Section 40 (2) pointed out that this was recorded as a risk on the Risk Register, but wanted to ensure that TUS were involved at the appropriate time and invite coming from Work Stream Lead.

The question of TUS involvement in the planning of the training was raised, Redacted Section 40 (2) pointed out that this was recorded as a risk on the Risk Register, but wanted to ensure that TUS were

**Extract from:**

**EU 3<sup>rd</sup> DIRECTIVE Examiner Workstream 10 March 2010**

The question of further Examiners Workshops being run would be decided on, following the training review meeting on 24/25<sup>th</sup> March at Cardington formulating the training needs for examiners. Should a need become apparent then they will be convened.

It was decided that this would be a suitable topic to be disseminated through 'Team Talks' and could be scheduled for Sept 2010. In the meantime will look at the possibility for assembling a 'Fact sheet' which could be circulated prior to the 'Team Talk', after receiving approval from the Project Board/Standard & Regulation

Need to establish what quantifies periodic training, and if it:

- Is linked to the individual,
- Provides personal development,
- Is linked to assessment

### **Action Points**

**AP – 10.02.10:** A forum is required to ascertain just what the Directive states in terms of '*improving the driving skills*', actually means in terms of providing training. **Redacted Section 40 (2)** to take forward. – **Closed**

**AP02 – 10.02.10:** **BY** will supply details of training currently provided by Cardington, and the number of candidates attending each strand of training, to **Redacted Section 40 (2)** by 17 February 2010. – **Closed**

**AP03 – 10.02.10:** **Redacted Section 40 (2)** is to put together a document highlighting different scenarios in relation to costs vs. training. – **On going.**

**Extract from:**

### **EU 3<sup>rd</sup> DIRECTIVE Examiner Workstream 09 June 2010**

Key Updates since March meeting: Cardington Workshop

**TT** briefed the group on the workshop and the Examiner Training Analysis report. It was noted that although T&A plan for 20% (the level that would satisfy the directive on driving skills) of examiners to complete the Update Course p.a., actuals indicated this takes place for approximately 10% over the last three years. The 2009/10 level of QC Assessments, Development periods, 1-2-1's and PDS's would satisfy the volume required by the Directive on Examiner skills. The question was raised as to whether QCAs and Development periods are linked was raised. **TT** confirmed this was the case and is evidenced on current documentation. **TT** stressed that DSA must adhere to the 20% level of Update Courses Jan 2013 onwards; otherwise the organisation will fall behind and struggle to catch back

### **Outline Business Case**

**Redacted Section 40 (2)** had previously discussed the Examiner Workstream assumptions on which the OBC was based (see paper) with most of the group and offered, outside of the meeting to update those where this had not happened. Specifically it was noted that the OBC was approved on the basis that the Update Course is planned for at the required

20% rate and not on actuals.

## Legislation

Redacted Section 40 (2) confirmed that DfT Legal had confirmed that Directive sections relating to the Examiner Workstream could be managed as an administrative procedure. This was because Delegated Examiners could be handled through amendments to existing terms and conditions.

*[Subsequent Note – Policy have issued advice from the Better Regulation Unit (BRU) that this may no longer be the case and that an Impact Assessment will be required].*

## Next Steps

(a) It was confirmed that further more detailed analysis would take place on the basis of three types of warrant card holders:

- Driving Examiners/Supervising Examiners (TCMs, SMs, DTAMs, OSIs, PSIs)
- Delegated Examiner
- Other S&R (ACDEs+)

(b) It was agreed that detailed analysis (by warrant card type) would take place over the next 6-9 months to support the full business case.

- This would document the current situation and confirm gaps with the Directive, identify options (and gain agreement) for closing gaps, plan how to deliver preferred options and confirm no non-BAU costs existed. The table structuring this analysis outlined in the paper was approved.
- It was agreed that by the next examiner workstream, as a minimum, the line requirements would be copied into the agreed table and further explanation/interpretation of those requirement (where required) would be provided/confirmed.

(c) The following responsibilities were agreed to complete this analysis:

- Initial Qualification – L&D
- Periodic Training Driving Skills – Course Content (S&R/L&D)
- Periodic Training Driving Skills – Administration/Evidencing (L&D)
- Periodic Training Examiner Skills – T&A
- QA – S&R

(d) Outline Plan. The timing of the outline plan was agreed.

## **Extract from:**

### **EU 3<sup>rd</sup> DIRECTIVE Examiner Workstream 22 July 2010, 9am - 11.00am**

#### Project Board updates.

Redacted Section 40 (2) advised that project board met 20/7 and had been brought up to date with progress per the Highlight Report. Feedback was as follows:

- two comments were made on delegated:
  - as some delegated authorities were accredited to provide CPC training there should be a degree of trust that they can deliver aspects of periodic training
  - to ensure meetings with delegated authorities both took the opportunity to invite industry players (such as representatives from CPT and ACPO) and was used as a vehicle to address any issues broader than the directive

## Gap Analysis

- a. Redacted Section 40 (2) referred the meeting to the table identifying warrant card holder types by job title. He underlined that those conducting the analysis should ensure that all job titles are thought through as part of this work, in particular for DE/SDE/SEs where many different job titles had to be considered
- b. Significant progress had been made completing the analysis though some areas still needed completion and several questions remained to be answered (as identified in red on the consolidated analysis)
- c. The individual sections of the Directive were not considered but the following were discussed:
  - i. What constituted a test. Supervised tests had been considered by the group analysing examiner skills periodic training. Redacted Section 40 (2) advised that there was scope for this to be considered a test because it represented a higher order skills where the supervisor had to both examine the candidate and the ability of the examiner.
  - ii. The group was working on the basis that the vocational entrant courses taken by delegated examiners would be accredited by the time the Directive came into force, though this was not the responsibility of the workstream
  - iii. Proposals were still required for ACDEs. The methods by which they complied with the Directive must be thought through at the same time as the other 2 types of warrant card holders, so that the full business case could be completed. DS would confirm the timing of this once the outline business case (programme level) had been approved by IAB, which was likely to be October. The methods would have to be delivered at nil cost.
  - iv. The update course and Driving Skills. It was confirmed by TT and BY that there should be no issues in revising this course to satisfy the directive on periodic training driving skills
- d. Redacted Section 40 (2) will continue to support those leading the gap analysis and requested that they book time in his diary to ensure the analysis is complete prior to the first workshop 16 September.

**AP03: Redacted Section 40 (2) (section 2 and 3), SD/ Redacted Section 40 (2) (section 4.2), TT/PC (section 4.2) and SD (section 4.1) to complete the gap analysis for their areas by Wednesday 8 September and provide to Redacted Section 40 (2) for consolidating and reissue prior to the first workshop (please use the consolidated version issued with papers for this meeting as some changes have been made to the format with each type of warrant card holder being clearly identified).**

**AP04: Redacted Section 40 (2) to confirm with Redacted Section 40 (2) the position on the accreditation of vocational new entrant courses**

## Communication to our own examiners

The timing of further communications was reviewed. It was agreed that something in the Weekly Update, specific to examiners, was appropriate in October once direction from Project Board was cleared and before a meeting with delegated authorities

## Risks

These were reviewed. It was agreed that:  
a risk should be added relating to the accreditation of vocational new entrant courses

**Extract from:**

**EU Third Directive ~ Examiner Workstream Workshop 21 October 2010**

**Options Paper**

**Cardington Response on Driving Skills Course for Delegated Examiners**

1. The email from Cardington was reviewed.
2. It was noted that the costs of £1250 for the course (based on manual vehicles) was indicative but not significantly in excess of the costs for a car based course. It was agreed that no discounts should be made if a candidate provided their own vehicle.
3. It may be that automatic vehicles have to be rented and this would be an additional cost. It was agreed that this would be discussed at the workshop.
4. In response to concerns that delegated examiners may leave it to the end of the 5 year period to take the course, it was stressed that a limited number of courses would be run (if the option was pursued) and that places could not be guaranteed. It was agreed that firm commitments should not be made at the meeting with delegated managers 24 November, rather an exploratory discussion should take place.
5. Policy were of the view that many organisations would want to take up the option of a DSA course given that it would satisfy the requirements of the directive.

**AP1:** Redacted Section 40 (2) to confirm BY has no further comments to make on the information provided by Cardington.

**AP2:** Redacted Section 40 (2) to confirm whether HR have approved accreditation of LGV/PCv and M/C courses. Subject to this also to confirm whether can make option to receive certificate known at Delegated Examiner Meeting 24 November in Cardington

TT expressed concerns on some of the ACDE options. Recommended options were provisionally agreed unless S&R could provide further details

A debate took place about the implications for evidencing of ACDE options being different to examiners. One view was this made auditing difficult with 2 systems. Another was that as long as it was clear what group an examiner related to different systems were possible. The use of PDSs was discussed.

Redacted Section 40 (2) expressed concerns (via email) about the options for delegated examiners to follow a version of DE/TCM/SM for Periodic Training Examiner Skills. AB provided further detail on the nature of a one day visit currently undertaken by Sector Managers.

Redacted Section 40 (2) questioned (via email) whether delivering the revised Update course for 20% of examiners would not lead to further estate/vehicles being required. TT confirmed that this had been considered in the analysis that took place at Cardington in March and it was confirmed then that there was no impact. 20 weeks of admin courses may be displaced out of Cardington. It was felt these could be delivered from facilities in

the Axis/elsewhere. Alternatively the new training delivery approach by DfT may lead to these being delivered elsewhere.

**AP4:** SD to progress options for ACDEs.

**AP5:** Redacted Section 40 (2) to provide costs for ACDE options once generated.

**AP6:** TT to take view of NC on options generated

It was agreed that contracts for new examiners should include a reference to the requirement to attend courses such as the Update Course at locations away from home.

**AP8:** PC to progress with HR the need to include a reference in examiner contracts to the requirement to attend courses such as the Update Course at locations away from home

### **EIAs and PIAs**

It was agreed that one EIA should be completed to include QC and QA for all examiner grades included delegated examiners so that all aspects of the Directive are addressed.

**AP9:** SD to progress with Redacted Section 40 (2) an EIA for QC and QA and call on Operations resource as appropriate

An EIA has been completed for the New Entrants Course and is being completed for the Update Course.

**AP10:** Redacted Section 40 (2) to ask L&D to ensure EIAs for the New Entrants Course and Update Course include delegated examiners requirements and consider EU3D.

### **Extract from:**

#### **EU Third Directive ~ Examiner Workstream Workshop 18 November 2010**

These were updated as follows:

**AP1:** Redacted Section 40 (2) to confirm BY has no further comments to make on the information provided by Cardington. [**Closed** BY has confirmed he is content]

**AP2:** Redacted Section 40 (2) to confirm whether HR have approved accreditation of LGV/PCv and M/C courses. Subject to this also to confirm whether can make option to receive certificate known at Delegated Examiner Meeting 24 November in Cardington. [**Closed** Redacted Section 40 (2) has confirmed approval has been given to accredit these courses and L&D are pursuing this within the financial year]

**AP4:** SD to progress options for ACDEs. [**Closed** – provided as paper for meeting]

**AP5:** Redacted Section 40 (2) to provide costs for ACDE options once generated. [**Closed** – ACDE options will be progressed through the quality forum and any need to consider costs cannot be confirmed until those being confirmed is clarified]

**AP6:** TT to take view of NC on options generated [**Closed** – NC advice is to refer outstanding discussion of options from project board to quality forum]

**AP8:** PC to progress with HR the need to include a reference in examiner contracts to the requirement to attend courses such as the Update Course at locations away from home [**Leave Open** – this has been requested and an update is awaited]

**AP9:** SD to progress with **Redacted Section 40 (2)** an EIA for QC and QA and call on Operations resource as appropriate [**Leave Open** – see minutes on agenda item 5 for an update]

**AP10:** **Redacted Section 40 (2)** to ask L&D to ensure EIAs for the New Entrants Course and Update Course include delegated examiners requirements and consider EU3D [**Leave Open** – see minutes on agenda item 5 for an update]

### **Paper for Project Board**

- 1 The content of the paper was approved with the following comments relating to ACDEs:
  - 1.1 the ACDE entries in the paper should be left undecided with reference made to the ACDE paper as an Annex
  - 1.2 the advice from NC is to refer the way forward on ACDE options to the Quality Forum in December
  - 1.3 policy underlined that whichever solution is pursued needs to comply with the Directive
  - 1.4 PC commented that the options pursued needs to be in place; Policy may seek to comment on those that would not appear to comply at Project Board
- 2 The paper will be updated to reflect the meeting with delegated next Wednesday, if appropriate.
- 3 The paper recommends that project board agrees that the directive is implemented on a BAU basis. If confirmed a further meeting would still be required to confirm exactly what is being passed to BAU.
- 4 Discussions took place about revising the Update course so that it can be used in its new form from 2011/12. These can be progressed after project board.

**AP1:** TT to indicate volumes of examiners likely to be received the Update Course based on the business plan for 2011/12.

### **Equality Impact Assessments**

**Redacted Section 40 (2)** outlined that L&D will progress EIAs as courses are updated or introduced. The EIA for the current update course and a separate one for its accreditation have been through final drafting and will be shortly passed to TUS and interest groups for comment.

S&R will progress a quality management EIA with the support of Operations so that quality assurance and control are covered off including delegated aspects and any relevant aspects of the directive.

### **Risks**

New risks should be created around ACDE compliance and room being made available within the business plan to ensure enough examiners are released from 2013 to comply with the Directive.