



Driver & Vehicle
Standards
Agency

Modernising driver training

public feedback

Contents

This document provides all the feedback from people who gave their permission for their comments to be published.

The comments have been reproduced exactly as they were provided.

Feedback on question 8	3
Feedback on question 9	56
Feedback on question 10	88
Feedback on question 11	118
Feedback on question 13	140
Feedback on question 14	155
Feedback on question 15	175
Feedback on question 16	196
Feedback on question 17	224
Feedback on question 18	259
Feedback on question 19	274
Feedback on question 20	362
Feedback on question 21	390
Feedback on question 23	403
Other responses.....	431

Feedback on question 8

It is proposed - Option 1 in the Consultation Paper - that we introduce a vocational qualification to replace the current qualifying tests (including reform of the trainee licence scheme). How strongly do you agree or disagree with this proposal?

This is an excellent idea

I believe the trainee licence should be controlled and accompanied by an ADI, a trainee instructor should only be allowed to teach when being overlooked by 1 ADI and that ADI's reference number should be printed onto the PDI's licence.

VOCATIONAL TRAINING IS TOO CLASSROOM BASED □ DRIVING IS NOT AN ACADEMIC EXERCISE IT IS A SKILL INSTRUCTORS NEED TO SHOW THAT SKILL NOT ANSWER PAPER QUESTIONS

If car instructors have to be compliant with stricter rules it can only help learners and road safety

Need more info how this would work

It is important that this training/teaching service is recognised as such, and the qualifications become as recognised as any Teacher.

too many training organisations treat training as a tick box exercise. I feel the standards would drop unless regulated. Better to keep to keep qualification assessed by the Dsa. Removing the temporary licence is a good idea again as the larger organisations abuse the system. Students are the ones that suffer.

I HAVE NO REAL KNOWLEDGE OF THE TRAINING TODAY ONLY WHAT I HAVE SEEN ON YOU TUBE

I feel a code of conduct should be introduced along with organization to investigate and implement complaints from pupils and ADI'S. I hear of to many stories from pupils that have been left feeling that the industry is a minefield of Professionals that put earning money over giving a good service.

The existing process is flawed but I am unsure if the replacement would be better.

As long as it still does "weed out" those not suitable.

Qualifications have no value whatsoever if the general public is still allowed to give driving lessons without charging fees. The current tests mean that potential instructors are checked for a level of competency which means that there is a realistic chance that the instruction given is valid.

The format of the test must be of such a nature that they cannot be abused as with the current Fleet qualification.

As long as the training centres are regulated properly.

I don't believe that the process of qualification should be made any easier. If approximately 50% fail then that is not necessarily down to the process more the individual.

As long as standards are still high or higher then all is well

nothing but class room is a cock up about to happen

It would not be in the interest of road safety is as part of the initial registration there was still not in place a check of the candidates ability to understand the rules governing the highway code or a independent test of their driving ability as is the case now with the DSA

ADI qualification should remain inside the DSA as they are the best positioned to oversee driving standards

More detail of what the VQ would comprise

Large organisations, AA, Rospa, IAM etc will flood the market because they are in a position to offer facilities and funding, this will be detrimental to fairness of availability. There needs to be opportunity for small businesses to compete with exam availability, or require it to be City and Guilds with an already approved provider

The current system is useless

It is better to to modernise the ADI qualification as it is a vocational trade

I can see no reason as to why the present arrangement has to be changed

I don't agree that a PDI should have to bring a pupil to the instructional qualifying test. One should be provided for the PDI if it is not going to be role play. Most PDI's, especially those who don't have a trainee licence, will have no access to pupils.

I would worry that this would make passing easier and add to the already over crowded profession, I do agree that the PDI side could be improved by insuring people aren't teaching without supervision.

I agree ONLY if the above proposed option have nothing to do with cost cutting; saving money.

Having taken and held vocational qualifications, I find them too generic and lacking in quality control. I agree fully with scrapping the current PDI arrangements which are dangerous.

To help the public understand that they are receiving training from a suitably qualified instructor. The present system does not guide the public to have that understanding.

As an ADI, I see quite a lot of abuse of the PDI system. I receive a number of pupils whose instructor has "stopped instructing" when in fact they have not succeeded in their Part 3. I feel this is detrimental to the professionalism of the industry as a whole

this will create more unqualified instructors (there will be no regulators for the trainers)and ruin the already saturated market.

I think the trainee (Pink) licence should be scrapped as pupils do not know they are being taught by an unqualified ADI.

I believe that the current qualification process is hard but fair and sets a standard for future teaching.

There was not enough information about the examination process to confirm if a PDI was actually fit to teach learners to drive

It is quite apparent the Trainee Licence Scheme is open to abuse and I am aware that this exists, particularly in some of the larger local Driving schools and very probably regional or national schools too.

The current system is suitable for purpose but it needs to be tougher

not trainees who are problem but organisations which charge thousands and provide poor

training

The current structure does not generally reflect the ability of a PDI in respect of their overall standard, a true reflection can only be obtained in a more structured way, not a 'one off' test..!

It will put livelihoods at risk for those on the ORDIT register and will not allow or competition.

creating more jobs for the boys and psuedo colleges to rip off people trying to become ADI's

As long as the qualification comes from the DSA and not another organisation that just wants the money and has no commitment to delivering a high standard

Slightly unfair when I have only just qualified as an ADI and you want to change the system.

I agree that there is improvements that need to be addressed however I feel that to make the qualifications a level 3 would be very wrong towards the trained ADIs. It should be a level 4 and keep the difficulty level the same.

The failure rate of 50% is because 50% are not suitable as ADI's , by dumming down the process and allowing entry to the register by a side door it will lower the standard not raise it. A ADI specific qualification and test is required not an by association entry.

The trainee licence is being abused by the same organisations that it is proposed will take over the testing. Without DSA control at source not afterwards by check testing this abuse will only get worse.

Why change?

This will bring Driver Training more into line with other professions.

Higher standard can be achieved thro better training

ADI should be teachers who are broad in their many approaches and not people who have passed a standardised TEST.

Some of the expectations that some new,or even ☐ existing instructors may be able to achieve class 1 commentary competence whilst driving may be asking a bit too much!

making the current part 3 more vocational would be a good move, but cant see that the part one

and part two can be vocational without reducing the quality of ADIs

The current ADI qualification is adequate, provided the required minimum training hours are adhered to.

Learning to pass your ADI part 3 does not really prepare you for the role. Personally i think some form of Trainee License is vital, it certainly helped me both to pass and to know what the job is really about.

Teaching can be a very practical 'hands on' skill. If it was made a vocational qualification it could deter some instructors who think it makes it too 'academic'

It would ensure a cross check capability, which is lacking within the current system

The Part 3 element of the current qualifying programme is anarchic and highly stressful to the applicant and expensive if they fail.

I disagree because we had a similar type of operation in the nationwide Instructor College which earned itself such a bad reputation in the public, media and industry and had such a damaging effect on the image of the industry that any risk of any such repeat as the result of a qualification which appears to be very documentary evidence based and in my opinion lends itself to potential abuse by training providers and could well result in training being provided which falls well short of preparing PDIs to teach people to drive is to be avoided at all costs.

I think a nationally recognised qualification would look more professional for the industry.

The DSA should have the balls to subject their own examiners, who will be carrying out the examination, to hold the same qualification as the people they are testing. It is incredulous that A. They will possibly be people who have never taught a real learner driver in today's roads and traffic and B. Will not have the same qualifications as the candidates they are examining. If the DSA wish to have any credibility then the examiners should have to hold the same skill sets or better than those being examined. What the DSA propose for themselves is an internal mickey mouse qualification to allow them to be an examiner involved in ADI qualifying tests.

This option provides more relevant and focused training. It also seems offer candidates a better chance of passing. There are many pdis who would have become competent adis but for a flawed qualification system. The financial loss is also unjustifiable.

This would help ensure a more consistent level of training.

It should allow much younger people to start a career in driver training with some kind of career path to follow.

mis use of PDI licence is common place particularly with large driving schools

An evolutionary rather than revolutionary approach to change is more manageable. There are many consequences to these changes which are not mentioned in the reports. The trainee licence scheme should be reformed first and a VQ introduced only once the new training system is working for PDIs. Option 3 now; option 1 in 3 years time.

I don't like the idea of a vocational qualification external to the DSA. There are currently training institutions who are notoriously 'fleecing' PDI's for their money who are just not suitable to become ADI's. This needs to be addressed. With an external vocational system, this problem might get worse. I also think it is extremely important for the DSA to be responsible for conducting ADI tests in order to keep consistency across the UK. In addition, I don't think ADI qualification is the priority concern. It is the current trainee licence system which needs scrapping as soon as possible.

i think the tests are outdated and unfair

The type of person that looks to become a driving instructor is not interested in getting a qualification, and are very often put off by the very sound for further institutional studies.

The general pupil however more often look for an instructor on price first and recommendations. I have never once been asked my grade are even if I was qualified.

I only agree if there are sufficient providers to ensure no manipulation of prices can take place. My concern is that squeezing out single traders will result in very few training organisations that are able to raise prices artificially. (AA, Red etc.)

I feel that this could result in too much class room based learning and not enough hands on experience to prepare the candidate fully for teaching learner drivers. It could also result in trainers without experience delivering a box standard qualification rather than bespoke training to suit the individual.

How will this affect current instructors?

I think vocational ☐ requirements are unnecessary

Driver training is considerably different to all other forms of training and in many ways requires similar skills and knowledge to aircraft pilot training, the element of considerable RISK to your self/pupil/others external to your vehicle is not encountered by E.G. a hairdresser!

tests are required to put candidates under pressure

I still think that to qualify to become an ADI then the exams should be done by the DSA the body who as far as I am concerned are best qualified

All professions have a trainee section where candidates can get on hands experience, ADI profession should be the same.

I don't feel I understand enough about the proposed alternative.

The present system has been in place and does need looking at however any changes still require to control qualification.

We agree with the Vocational Qualification "in addition" to a Part 1, 2 & 3 Test.

these tests are unique, making it into a vocational qualification may undermine the quality of these tests

this is a safety first work not just to earn money...this will make it easier for those sort to enter this industry

For those of us that have already paid for training and gained our place on the register, why should we now need to take a NVQ to prove we are capable, we already do our check tests.

Teaching people to drive is totally different to ANY other form of teaching. Qualification has to remain focussed on the unique qualities required for becoming an ADI

Having attempted to achieve the ADI qualification I failed the part 3 test 3 times. I do not believe that the qualification should rely on a single test which is taken in a very stressful and false environment.

What difference will the decision make to a already qualified instructor to answer this question?

Why not vocational qualification before qualifying tests?

will there be grandfather rights for existing instructors or a future start date to comply by.

reform of trainee licence scheme - the proposal to enable any ADI to supervise lessons given by Trainee Licence holders does not guarantee that instructional standards will be met. It undermines the ORDIT qualification. It opens up a market for 'rogue' traders offering cheap sub standard instructor training via sub standard driving tuition. There appears to be little to offer in terms of upholding or increasing standards of driving tuition and of instructor training by allowing any ADI to supervise instructor training.

This will prove competency in all areas and will not put added pressure on to potential ADI with the testing procedure and that they may fail.

the trainee licence needs to be looked at

It doesn't make any difference if you call it a vocational qualification.

If the qualifying examinations are not conducted by the DSA, I feel that they would be diluted to the point of producing sub standard instructors.

I think that people who are disabled and can not work and they have some one looking after them full time then they should not have to do the theory test or the hazard perception test but should be just able to just learn to drive and then pass there test or should automatically be given there full driving licence for those who are disabled and the ones who look after a disabled person

I think the current teaching test (part 3) is good and should stay but along with this we should be taught about how people learn in different ways eg: auditory, visual, practice etc...

How different people are different means we should teach individuals different lesson plans based on them. Not a 1 type fits all like the DSA wants now. More like a teacher in a school learns about psychological factors within individuals.

3 exams are better then national vocational qualification , strongly agree all PDI's should be accompanied .

For too long large companies have exploited pdi's and this is not fair to those who are trying to

pass their driving test as well

There should be no trainee Licence whatsoever

these people need tugh control not less

I am currently a PDI working my way through the three qualifying tests at the moment. I think a 'Vocational qualification' does sound better. However, I would still like the option of the trainee licence as this would be able to help massively with my part 3 and be able to get real life experience.

It would not be a good idea to make the process too complicated for people looking to train as instructors.

In my opinion the current qualifying process has extremely high standards which should be at all cost maintained I fear this would not be the case with a vocational qualification

I agree because those who do the training should be allowed to gain credits in their learning thus allowing them to develop their skill more broadly and use those skills in other areas rather than just in driver training

A recognised qualification is more likely to attract appropriate PDIs and raise the profile of ADIs with the public.

The qualification should be nationally recognised and encompass all aspects of driving, instruction and admistration.

Although the concept is good, I have concerns how this would actually be recognised outside the industry and how long it would take to become a recognised qualification.

The three stages of the current qualifying tests will be watered down and standards will fall

If the vocational qualification is to be given once the training establishment decide the candidate is ready, then, surely this is open to abuse by the tring provider. i.e.Keeping them as a trainee for longer than required to earn more fees. Once a potential ADI has started training they will find it very hard to move to another educator if they think they are being taken advantage off.

the dsa should remain in control of the qualification process. To give the final qualification test to an outside party would leave the process more open to fraud

I totally agree that the trainee licence scheme needs changing, but totally disagree that vocational qualifications are the way to do it.

A qualification like the PTLLS would be an ideal entry to become a driving teacher.

If its vocational, who will provide the training

I am in total agreement that the current system needs to change, as the trainee licence scheme is abused, and not policed by the DSA (I haven't had a trainee that has been asked for a ADI21AT to be produced as proof of additional training for years. The uncertainty I have at the moment is who is going to be delivering the qualification, as the proposals suggest that the cost to become accredited, let alone to continue accreditation is going to be approximately £30k, which only leaves the big players in the industry in with a chance of catering for the new proposed regulations. Therefore individual trainers and small business owners like myself are going to be out of business.

It appears as though the large companies will be the only providers of this training. Where dose this leave ORDIT registered individuals?

It will both prepare the PDI more thoroughly and comprehensively for the real job and do away with the part three which I believe is only suited to those who can act.

The proposal to alter the trainee scheme by enforcing an ADI to accompany will make costs astronomical. One party involved would have to lose money. The main part of allowing 'credits' from previous work skills is good and proper

Many of thye skills required are transferrable.

The three part test has meant the instructor training industry has prepared new instructors to pass the test. New instructors lack the skills to adequately train learner drivers for modern driving. A vocational qualification has the scope to focus on the new instructors learning how to help learners develop skills. This is the right time, now that client centered learning is being embraced. I fully support implementing option 1.

Vocational qualification is a good idea, however the removal of the exam from DSA control is a bad idea. The DSA are seen as impartial whilst any 'For profit' organisation would not be seen in this way.

There is a need for a nationally recognised standard in instructor training. The trainers require to undertake a specific qualification. What will this be? The vocational proposal is quite

cumbersome! Also a large part of the training is 'in car' - there could be more than one trainee in car but this again causes problems. The vocational training does not cover any business training and as a large number of instructors need to run a business this seems lacking. This may come from being the current system is run by the testing body not a training body.

I believe that, as it currently exists, the Part 1-Theory Test lends itself to a classroom environment, so personally I would like to see that. I feel you could cover a far greater amount of each "Sub section" such as Road Procedure and in particular Law & Disabilities and in far greater detail. A strong base knowledge is essential for any good, safe driver but for instructors you need to have a far wider and deeper knowledge than that of a learner driver in order to confidently deliver and impart your knowledge on your students. I also strongly believe in having a fully qualified instructor alongside to shadow you. Like any skill based job, on the job learning is the best way to build up and improve your skills. I personally am a bit of a perfectionist so I like to get things right. If I had an instructor to shadow me/coach me I feel I would benefit enormously as he/she could point out areas of weakness and help to improve my skills so I can be an effective instructor. This in turn would help to raise the standard of driving on our roads as the level of instruction improves. Just like the new standards check aims to achieve a better, more consistent level of instructing.

The industry has a poor record of developing competent instructors. Because the focus for many years has been on 'Core Competencies' the DSA needs to ensure the levels of competency to deliver training to meet the National Standards. We need to be allowed to 'develop' trainees client centred skills. The Hermes project refers to months if not years and this cannot be done in a few lessons with an ADI sitting on. A trainee licence scheme policed by DSA can work once a minimum level of competency had been achieved.

Eperience with training providers has been dismal with the trainers often having a very limited knowledge and no qualifiactions in classroom teaching

Many trainee ADIs are older experienced people who may feel that to go through a NVQ course may be a little too much in their later years of working life. This life experience may be lost to the driver training industry though I feel it would also benefit the industry to have a structured training program.

I dont feel ADIs understand it fully enough or what it will involve to be a trainer of ADIs under this scheme

The Training process takes time (For me, I have been undergoing training for approx 1 year to prep for the part 1) and Potential

You are trying to make it a professional organisation (which i agree) but you still allow mum/dad/partner to instruct new drivers? Why should new instructors bother to get a NVQ to do

this job?

I have been involved in ADI training and have been ORDIT qualified. Sadly, I have seen people who were signed up to train and did not fully understand what was involved and also, did not have the aptitude. I understand that PT1 has the highest drop out rate. Plus, for those who go through to PT3, but for whatever reason, never qualified, had nothing to show for the work they had put in. A vocational qualification would allow people to gain something, even if they never became an ADI. It might also make ADI training establishments review how they deliver their training and lead to better qualified and knowledgeable ADIs.

Passing the Pt 1 phase of becoming an ADI provides an instructor with extremely valuable background knowledge needed to teach their pupils. I feel that this important part of the qualification could be slightly overlooked. I am also uneasy about the fact that no formal testing for the qualification will take place.

concern about the cost of delivering this training

The qualification process is costly and although people should consider the cost and the likelihood of being able to complete and successfully qualify to become an instructor, anything that helps either to reduce the costs, or helps to ensure that any training of qualifications taken will be transferable will ensure that any investment or costs incurred are not wasted would be a good and positive thing. As a driving instructor, it is not fair either on us in the industry who are fully qualified, or on the general public, that an unqualified instructor can conduct lessons without supervision and charge a full lesson price whilst not being fully qualified. We don't accept this for other areas of industry such as an electrician or a plumber, and this cannot be right for such an important job as a ADI. This needs to be changed.

The present system works. Standards would be lowered. Many one man trainers operations would lose out despite some of them being very good trainers. Road safety would be affected wiping out any savings made by outsourcing the Qualifying tests.

I am an Independent driver Trainer and don't want to work with anyone else to deliver Training

This will support the continued professional approach to driver training and look at proper pedagogy

Stop all training on I plates no training unless with a driving instructor.

It is important that the vocational qualification does not dilute the need to have a more thorough understanding of the Highway Code than the average member of the public has when starting

ADI training

To is needed to make this a profession. The PTTLLS qualification and some form of qualification in learning disabilities need to be reflected in the training

The introduction of a formal qualification would require much monitoring to avoid standards reductions and to ensure sufficient knowledge and understanding and that this is valid, reliable and represents an individuals

own work. A vocational qualification IN ADDITION to what exists would be a better option

I think if we look at the vocational route- it will push out the sole traders like myself. To become an assessor , to employ a verifier , to pay additional costs to be inspected, and to pay an awarding body to allow me to trade- will

make my business (a small company) not commercially viable- therefore I

think it will only work with the bigger organisations. What we will lose is the quality

There needs to at least minimum standard of English language.

The qualifying regime which is currently in use serves a purpose which all ADI's have had to pass, to water it down would not be sound or sensible

decision. theory is a must know...Driving at a high standard is necessary, the exam where the SEADI pretends to be a pupil in two parts is something that is quite difficult to get your head around, yet we have all had to pass this....How you could possible improve would be to make the test an hour and half to allow the PDI more time. The trainee license is abused by some companies in our industry.

Paper excercise to justify your presence. Change doesn't always mean improvement but the civil service thinks it does.

Seems like a very good plan, however more detail about how the vocational qualification will be regulated and quality assured would be welcome

Proven and tested system why not leave alone. Perhaps room to negotiate a change in the reform of the trainee licence

Having a qualification dosn,t make you a good driving instructor, as does not having one make

you a good one, but it will reduce the number.

I see nothing wrong with the current qualifying tests

Not sure how many will use the vocational qualification, but the old system is rather cumbersome and limited. If this system provides options and modernisation, then that is fine.

a trainee licence as it stands benefits no one, not the pupil, PDI, the only one who does are the companies who sell franchises to PDIs ..

I think the present test is satisfactory

If it is not broken don't repair it

Hopefully this will not affect the status of currently qualified ADIs.

This would help eliminate trainees who see Training as an ADI to be only a money making business rather than a responsible profession which impacts upon road safety and the reduction of casualties on our roads, in addition this will help reduce the number of large driving instruction companies (some of which years ago were trusted brands) who now see that training potential instructors is far more lucrative than providing genuine driving instruction to pupils

There is nothing wrong with what we have, just need to limit the number of new ADIs

Let's all go PC

I know organisations , that make money by using 90% trainees to teach. The ways will stop them.

vocational qualifications are more realistic of ability and effort compared to a 'snapshot' of one teaching experience

I suggest the "Prepare to Teach in the Lifelong Learning Sector" higher education qualification which is awarded by a university

I think that a lot of Ofsted instructors who work as individuals will leave the industry therefore causing more unemployment

The current Part 3 qualifying exam is out of touch with the real world of driver training

I believe that a vocational qualification would introduce a wider range of ADI standards depending upon the professionalism and integrity of the training body. An in-house qualification process administered by the DSA would ensure consistency.

Current Instructor training is poor and the wrong people are allowed to become ADI's and mis-informed about the reality of being a ADI.

Agee with proposal of the pink badge.

The option for a trainee to give paid instruction only with a qualified ADI present would mean trainees receiving very little actual experience. If the trainee is giving the lesson, having explained to the learner that they were a

trainee, the lesson may well be discounted, whilst the trainee may earn while they learn, the ADI will effectively be giving there time for free. I can't see many doing this.

I feel it's a good idea that after you qualify to become an ADI you will receive a proper qualification. I also think its right that you can come away with some useful qualifications even if you don't pass all of your exams.

The current trainee licence is abused by some PDI's

Great idea. The current trainee licence needs to be changed as I felt I needed feedback on my lessons so having an instructor in the back is a great idea for support and advice.

The level of quality control will be very important and standards for a successful completion of the course will need to dovetail closely with the new standards check.

Training licence are being abused so I feel they should be stopped

Leave it as it is

Better instruction and training for safer British roads is needed

There will always be need for the trainee to be tested before being given a ADI licence

This would discourage new instructors from the industry

Any requirement which allows larger training organisations to both train and qualify candidates is open to abuse by those organisations despite any assurances that may be given. The system will essentially produce 'ADI farms' and will not improve the eventual standard of recruits to the industry because the companies concerned will not be able to resist the temptation to

set their own pass rates for the obvious financial gain they will receive. Since DSA is not directly involved in the testing process this system will be abused. Many very good instructor trainers will also be put out of business because of the regulatory and practical changes. There is no evidence that larger companies are any better at training ADI's than solo trainers and when considering that the large scale abuse of the training system in past years for financial gain has been carried out by such large companies it can be said that this option will actually return the industry to the time not too long ago

when prospective instructors were essentially ripped off by training organisations. The only difference will be that they are more likely to qualify without actually being able to function as a working instructor.

Good idea to give the PDI the opportunity to assess for themselves if they are correct for the job, before paying a lot of money up front for training.

The standards of instruction have declined over the years/decades because of the DSA , The industry is now overwhelmed with weak instructors , this will make a very bad situation even worse

not very fair on the pupils as it is open to abuse by driving schools pupils will get under qualified instructors

this proposal will bring ADI's into the public eye as (perceived) professional

it has been proven through existing vocational qualifications that they are easier to achieve thus lowering the standards of adi's

i think pdi s should under supervision and be compulsory before final exam

I am currently ORDIT registered and am concerned about how this change to a vocational qualification might affect me - will I still be able to offer training independently?

Present system has worked well and has a more practical approach

Much better career wise to have a vocational qualification

Agree that the qualifying process for PDIs needs to be updated, however firmly believe that part 3, especially, should remain as a predominantly practical in car assessment as per standards check doing away with roleplay and fault simulation

Its time now to make it much harder for people to register. As there is very little work for those that are in the industry. When I first started in 1986 there were 20000 instructors chasing 1 million prospective pupils. We were nicely busy. Now there are 46000 instructors chasing approx 750000 prospective pupils. Probably due to the present Credit Crunch. This has a knock on effect as people loosing their jobs think its an easy way to make money as per a certain national school say Instructors can earn £36K which we all know is rubbish.

#out sourcing to any third party would leave the system open to abuse. Profits should not be an option

I am quite happy with the current process however it seems clear that organisations have previously been able to get away with delivering very poor value for money service to the prospective instructor.

This will ensure that the number a ADI applications drop substantially. I would expect the register to reduce by 75% over the next 5 years, lesson prices will go up giving a more sustainable income to current ADI's.

At the moment the system need to siv out those who are not fit to teach as there are too many under performer teaching people to drive to a very low standard

Vocational qualifications do not have the same personal input of as practical test

The trainee licence should be abolished.

i already have a voluntary nvq level 3 qualifiction where would that fit in the new standard

The proposal of the ADI being in the car with the PDI during lessons would never work unless the PDI doesn't want to get paid. ORDIT Registered trainers will need to become part of an accredited training centre or stop training resulting in a loss of income. The additional bodies

involved to deliver the training, assess it and provide the qualification would appear to be too costly. The more people involved the costlier it would become.

its not necessary to be able to read and write when teaching how to drive a vehicle. some people are dyslexic.

The govt wants to reduce post test casualties, therefore you should be concentrating on post test activity not pre-test activities

From my experience of working in schools a lot of vocational qualifications seem to be aimed at the lowest common denominator and seem to be more of a tick box exercise rather than providing proper training or education

Need to get the professional back behind the wheel

Only looks to be money be money generating for DSA

I would like to see an assessment of the potential increase in numbers attending the course, and therefore going on to become ADIs. Increases in numbers of qualified ADIs will undoubtedly impact on the welfare of long standing professionals in the industry.

The standard will drop allowing more ADI's in and the market will be flooded

stop meddling

In previous employment as workshop supervisor worked with skilled staff. staff with old type City & Guilds were 100% more skilful & experienced than the NVQ 1,2, 3 vocational trained staff on this experience I would be not be in favour of Option 1

This seems Like it would make the person training more ready for the real situations that they will have to face.

Disagree with an external agency with assessors with no experience of driver training becoming involved.

Make it more relevant to fire service trainers who train licence holders only

It will cost more money and it will have same result after all.

i feel that if the training was to go a vocational scheme that the expense would push out the normal working person.that the driving training be for the wealthy only. i think that the training licence should be reviewed, with the introduction of an ADI assissting on some of the lessons.

Bot very sure about this - I will go along with MSA's expert opinion on this

Replacing the qualiifying tests would be a step forward in terms of consistency.of training. However the proposal for the trainee licence scheme would limit the experience of PDI'S prior to test.

The current PDI/ADI qualification process is perfectly adequate. The DSA is in danger of attempting to 'over-intellectualize' the qualifications process

This is long overdue

Trained with BSM and found their training program to be poor. On consulting with other driving instructors they voiced similar opinions of the training programs they had experienced. I was told that I was the first PDI in that

office of BSM to have passed parts 1, 2 and 3 first time, with the poor quality of training I received, I found this understandable and this left me with no faith in the overseeing responsibilities of the DSA regarding training programs.

The DBS check needs to be done before people commit any time or money to the learning process otherwise, people will go through the vocational qualification and then fall when they try to actually become an ADI. It also

suggests that someone who has not had a DBS check could teach if accompanied by an ADI which sounds dangerous to me.

I think that this would make the industry look more professional and attract younger instructors.

I think that currently the trainee license scheme is being used by some driving schools to cash in on people wishing to train to be ADIs. Giving them bare minimum training and then letting them loose on the road with paying students who are ignorant of their "instructors" lack of knowledge or skill. I see evidence of this every day while I am out teaching. I was a very well supervised trainee license holder before qualifying in 2002, but some of the pink license holders I currently encounter whilst teaching are frankly verging on dangerous

The tests especially the Part 3 Teaching Ability needs to be updated, a vocational qualification

may do this. Trainee licence holders need to be monitored to ensure skills are being developed.

When I did my ADI training I felt that there were lots of information that I know now that was not in my training I.e I was not fully trained on how to teach all of the reversing manoeuvres by my tutor.

I feel the lengthy Theory Test and Driving Test elements should stay. However I think that the Part 3 instruction test is unrealistic. I've been instructing nearly 10 years now and have never encountered anything like is portrayed on the part 3 test.

since the DSA took over it made the part 1 easy to pass due to the publication of the questions. Go back to pdi learning all the relevant books then sitting a test that is also a credited qualification. ORBIT approved

trainers don't always provide good service in my experience because I have helped numerous PDI who have been trained badly. Trainee licences are a valuable process of learning to handle the numerous different skills needed in teaching. roll play by examiners is useless because it doesn't remotely resemble a pupils responses.

Strongly agree with the proposed changes to the trainee licence, trainees should never have been allowed to instruct without supervision. However I have reservations about the proposals making it easier to qualify as an ADI

The current Trainee Licence scheme is wrong on countless levels, it is only beneficial to larger schools / organisations for them to generate fees for themselves. What has proposed I fully agree with.

A vocational qualification for ADIs, based on the National Standards for developed driving competence will provide the basis for a system of coherent and progressive qualifications and recognition of all persons engaged in

driver training and development. We have put in place the National Occupational Standards for LGV Driving Instructors and intend to develop a vocational qualification route which will provide progression from the

qualification proposed here.

As an ORDIT trainer my training is recognised by the DSA as being competent to deliver training. With only 220 ORDIT trainers on the register, there are obviously many ADI's out there who are offering training. That

training could be sub standard and costing trainees excessive costs as it could have been completed sooner if delivered correctly. Introducing a Vocational qualification and Assessors

and IV, makes it clearer to those wishing to train the importance of training with a recognised ADI.

“Having previously submitted my views on the new proposals, I have since taken part in the web chat with Mark Magee and Ian Holden on 09/07/13, and attended the ORDIT focus group meeting with Jacqui Turland at Burgess Hill MPTC on 23/7/13. As a result my understanding of the proposals has significantly developed, resulting in further views and concerns to those that I have previously submitted. I would like to therefore further justify my opinions and views on the whole consultation including the Green Paper on “The Young Driver Debate”, and Jacqui Turland strongly urged us to express our feedback in as much detail as possible. I appreciate this response may be somewhat lengthier than the responses you have anticipated, but I do hope the views I have expressed are heard and noted.

Whilst I am in total agreement that the current qualifying process for new instructors needs to be changed, I am not necessarily in agreement with any of the three proposed changes. I can't see how these changes will address the 'Raising the standard' issue, as it does not really address the main issues of improving the current way in which people learn how to become safe drivers, but rather focuses on regulating the training to become an ADI process. The consultation seems to focus more on regulating and penalising ORDIT trainers for abiding to the voluntary rules of the register up until now, with the common belief that the register would at some point in the very near future become the mandatory route for people looking to become an ADI.

Changes to the current Trainee Licence are definitely necessary because the trainee licence at the moment is widely abused by many driving school's business model as a way of getting instructors on the road, and produce further income from a franchisee by way of a franchise. Being the owner of a small driving school (12 instructors) based in South London that uses the trainee licence as a tool for PDI's (maximum of two at any one time) to get experience, I do believe that as with learner drivers, hours of experience on the road in real life situations is invaluable before the final assessment and qualification, as no matter how good a trainer or examiner is, they cannot reproduce the same faults and level of uncertainty that a real life pupil and situations can. However, as an ORDIT trainer, together with many other trainers I know, I get a lot of business from 'Part 3 rescue training' from PDI's that have already been to other training establishments and received substandard training. When I say sub-standard, I don't necessarily mean the actual training, but the way in which it has been delivered. For these larger training establishments, some for which I have worked for as a trainer, it is all about getting as many people as possible signed up, regardless of their suitability or potential to become an ADI, hoping that a large percentage of these people will drop out after having paid, and for those that do persist with the course, get them through the 40 hours of Part 3 training as quickly as possible and out on the road as a PDI paying a franchise. Often PDI's come to me or other independent trainers I know for further training to help get them through the Part 3 qualification, even though they are on a trainee licence with another school. The main flaws in the current trainee licence system that I have seen abused are: 1. The 40 hours have been signed off, but not completed. I have witnessed this being done by a PDI's relative who was a qualified ADI, but not an instructor trainer, just so that he can start working for him. 2. The 40 hours being done as 'observational' training by the PDI sitting in the back observing an ADI giving a lesson. 3. The 40 hours is not delivered over a realistic time period. Sometimes the

trainee has not been able to get training booked in with their trainer because they have so many trainees to try and fit into their diary. As a result they well exceeded the 6 month period for the validity of the hours towards the licence.

Sometimes this can be by as much as a year. In the other extreme they have completed the 40 hours in just 1 week, shared with another 1 or sometimes 2 other trainees in the car. Then they are sent out to teach, totally under-prepared. 4. The 20 hours additional training has not been completed within the three month specified period. This has ended up being abused as the Registrar does not enforce the requirement of a completed AT21 AT to prove the hours have been undertaken. The regulations stipulate that the PDI must complete 20 additional hours of training within 3 months from the start of their licence to ensure quality, and send proof to the DSA. Alternatively if they sit a Part 3 test before the three month period they should produce the form to the examiner. Although I ensure the relevant training is provided and the documentation completed, I have not known of an examiner to ask for the proof, or for the trainee to be chased by the Registrar if the proof is not submitted to them within the three month period. 5. The PDI learns and practices the reality of the job, mainly dealing with faults and problems as they arise, with the added advantage of knowing where they are going. Whereas the Part 3 could be in an unfamiliar area, and the examiner gives directions to create situations that the trainee is not, as they would be if they were familiar with the area and had the local knowledge, prepared to give proactive instruction to assist the pupil. 6. The trainee licence is widely used as a meal ticket, or a way to pay off a franchise, rather than as the training tool it should be. 7. The condition that driving schools must have at least one fully qualified ADI for every trainee PDI is not monitored in any way, as the DSA do not know who works for what school, or indeed if they are independent. The abuse of the current system has widely resulted in too many instructors on the road for the amount of demand from learner drivers, and the value of the driving instructor industry and the credibility and reputation of the ADI has been driven down, as together with the economic climate of recent years, for the majority of prospective new customers it is going to come down to getting the cheapest price to pass the driving test or become an ADI. The argument for this is often that if you are good enough, then people will pay a premium for it. I am an ADI of nearly 14 years and currently Grade 6, ORDIT, Fleet accredited, and hold the DIAMOND special test certificate. I have also undertaken numerous CPD workshops and regularly attend association meetings, and am a driving school principal. Therefore I would class myself a reputable and good quality instructor. I do receive recommendations, but nowhere near as many as I used to, and the feedback I all too often get from pupils that have recommended me is 'No, my mate says you're way too expensive and they can get lessons for half the price, or even 10 hours of £99 with.....'. This is especially more evident in areas more densely populated by ADIs and PDIs like my area of South London and Surrey. I currently average a lesson price of only £21 per hour, whereas 10 years ago when overheads were cheaper I was averaging £27 per hour. I can't understand how anyone can make a living out of anything less, let alone pay for and run a vehicle, and pay for a franchise or effective advertising?

However ADIs and PDIs have to charge silly prices to attract the amount of pupils they need to produce enough income to pay their franchise and put food on the table, and work long hours to achieve it. Often they are tied into a long and water-tight contract with a school. I have recently had dealings with a PDI that had a 2 year tie-in period, and was being threatened with court

action if he broke it. The school had given him 3 'leads', not even confirmed bookings, in 6 months. Yet he had to find nearly £300 a week to pay his franchise. I have known PDI's that have been taken to court by their franchiser as they failed their Part 3 three times before their contract ended, and therefore were deemed to be in breach of contract. This clearly needs to be regulated and controlled for PDIs coming fresh into the industry. The main flaws in the current Part 3 test format are: 1. The two, half hour phases are too short to be able to demonstrate a realistic representation of a real life driving lesson. 2. Having to treat a senior examiner as two different pupils back-to-back in different roles is very unrealistic, and many Part 3 candidates struggle with this. 3. Trainees become frustrated due to very basic instructions being ignored so that the examiner can commit a fault to test the candidate's core competencies. 4. The Pre Set Tests do not portray a real lesson. For example, 'Emerging' and 'Approaching' being taught separately, or 'Pedestrian Crossings' being taught together with 'Use of Signals', and on PST 10 having five fairly complex subjects on one sheet. 'Meeting' can easily be a 2 hour lesson on its own, and if any subject should be combined with it, it should be 'Adequate Clearance', not 'Crossing the Path'. 5. The format of 10 PST's covering only 12 different subjects makes it fairly easy for a trainee instructor to only learn those subjects before going out on the road, and there is a vast array of further knowledge that is required to do the job. I believe that the new VQ would be better in this respect providing the hand book Jacqui Turland described to us is comprehensive. 6. As the format is so different to a natural lesson in the time frame and the natural flow of dealing with everything that arises, and not just focusing on one topic, PDIs struggle to adapt. The problem with the current system as I see it is that ORDIT lost all of its credibility when the ORDIT committee was disbanded in the mid 2000's and the DSA took control and suggestions were made that the register would become mandatory for instructor trainers. Until then the register was fairly small nationally compared to where it is at now, and the high standards were maintained and representatives from within the training side of the industry had input. Following the DSA taking control, the number of trainers on the register exploded, with some large organisations that were not previously on the register having many, many trainers entered onto it.

This was around the time that standards started to plummet, and the number of PDI's being signed up by these big organisations exploded. Around that time I was working for one of them as a trainer and saw it first-hand. This particular stand-alone and independent company was a training establishment, not a driving school, and their main business model was to sign up 24 PDI's a week, paying circa £2000 each, and for the majority of them to drop out. It was also around the same time we were hearing and seeing the many adverts on the television, radio, and in the local papers about how great and lucrative it is to become a driving instructor, and there were lots of learner cars driving around with either 'Pink badges' or no badges at all in the windscreens. However, the general public didn't, and still don't know the difference. This uncontrolled exploitation of the industry has not just affected the livelihoods of many decent instructors, but also and more importantly dropped the standards of drivers that are being presented to and passing their driving test and being allowed on the public roads.

Horror stories on the likes of 'Watchdog' and 'Rip-off Britain' and other more recent 'reality' programs have in my opinion severely damaged the view of the general public towards driving instructors, and de-valued the majority of us professionals that have worked hard at developing a good reputation over the years. As a result the public don't feel we are valuable, and therefore

are not prepared to pay a realistic and fair rate for our services. However, although there are some ADIs out there that need their standard raising, which hopefully the new Standards Check will facilitate, it is the education and changing the attitude of both learner drivers and qualified drivers that is going to raise the standards of driving on the roads of the UK. Changing the way in which people train to become instructors will not on its own resolve the current standards and reduce casualty rates of young drivers. We as ADI's are finding it increasingly difficult to convince learner drivers to take the required amount of lessons to prepare them for a life of safe driving, as all they want to do is pass their test as quickly and cheaply as possible. This is why the driving test pass rate is so low, as the vast majority of pupils will simply not pay for the amount of hours they need to be safe, just enough to get them through their test. This doesn't just come from the pupils, but even their parents. The trouble from our point of view as business owners is that if we don't take them for test, as we quite often refuse to do, we lose the business and they go to the instructor down the road who has lower standards and will take their money, or they go out with mum or dad, sometimes illegally! Youngsters in particular will tend to copy what their peers do, and try to keep with the trend by doing it as quickly as possible.

Whether this be the way in which they learn to drive, or the way they drive once passed. So if they hear a friend is doing manoeuvres or dual carriageways with their instructor then they expect to do the same. There now seems to be a boom in people wanting to take intensive or 'crash courses' or 'Pass in 5 days!'. I strongly believe that in the same way as a PDI taking 40 hours of training in one week, this is an extremely poor or even dangerous way to learn. There is so much information to absorb to develop this new knowledge and skills required to be a safe driver. For the majority of people any more than 2 or 3 hours maximum in one day is too much and learning freezes and fatigue sets in. As a result they don't get a chance to think about and process that they have learnt. However, because of the modern pace of life this is what learner drivers are increasingly expecting and seeking. The biggest problem is that by the time a 17 year old reaches the driving seat they have already been exposed to bad driving practices for years, and no matter how hard we try to coach them, it is very difficult to uncondition that mind set and coach them towards safe driving. All the time standards on the road from qualified drivers remains low I think we are going to increasingly struggle to raise the standard of new drivers, without more control and regulation over the learning and gaining a driving licence process. Another issue is the lack of control of foreign drivers coming to the UK with an EU licence without having to take any familiarisation with driving in the UK, let alone obtain a UK licence. From my recent experiences the driving standards across Europe, particularly attitudes, are considerably worse than that in the UK. This is now also influencing the way other people drive. The new National Standards for Driving and Riding are a good start, but there needs to be a set curriculum and standard that an individual needs to achieve before they can be presented for a driving test. The DSA halfheartedly attempted this when they used to send out the 'Log Book' with provisional licence applications, but I believe this ceased some time ago.

Considering that I believe that the driving test is too easy, and doesn't cover a comprehensive enough look at a candidate's ability and competency to drive, as opposed to not committing more than 15 faults, the national pass rate is at an embarrassingly low level. This in itself makes it clear that the standard of learning is low, but I don't think it is fair of the DSA to blame that on ADI's, and especially not their trainers. The regulation changes need to be geared more towards what the learner is required to undertake before being presented for test. There also needs to

be some control and assessment of their ability and performance post-test. A good example of the need for this is a 17 year old lad I taught a few years ago. He took 15 hours of lessons with me after driving illegally with his father for 2 months. I really had to push him to take this many hours too. He passed his test first time with 1 driver fault. The following day, because of speed and showing off to his mates, he wrapped his car around a lamp post and put his girlfriend in hospital for a week. He was prosecuted and given 5 penalty points for 'driving without due care', so was still allowed to drive. I found out about this via Facebook, where he was making a joke of it. I found it sickening that there was nothing more I could have done to influence his attitude in the time I had, but in doing my job had assisted him in being allowed on the road, and being a danger to all of us. It is my belief that with someone like that, and they are becoming more and more common, it is going to be impossible to educate them in 'safe driving for life' without a set minimum amount of hours of practice and experiences incorporating a syllabus, and further education and assessment on attitude and the reality of the dangers of driving a potential killing machine becoming compulsory. At the moment I get the impression from most of my new learners that it is almost a rite of passage to get their driving licence as soon as possible, and many of the young ones see it as a thrill seeking experience. There is very little or no education for these young people until they either start taking lessons or study for their theory, by which point it is far too late as the wrong attitudes have already been instilled. The only way a swing in the change of this attitude is going to be achieved is by bringing road safety and attitude towards it into the National Curriculum at an early stage, and an education and award process like that of "Drive IQ" or similar nationally recognised occupational type qualifications or accreditations being introduced as a mandatory part of the normal learning to drive process. As well as improving the individual's safety, this will also be something to add to their CV and help their future prospects. In the last couple of years I have been into 6th form colleges, St Johns Ambulance Cadets, and Explorer Scout groups and other organisations in our local community to present a road safety presentation based around the 'Think' campaign, making the emotional, physical, social and economic consequences of poor attitude towards driving very clear. The feedback from both the organisers of these groups and the participants themselves has been very positive. Often it has been expressed that many of the points I have highlighted have never been considered and the session had been a real eye-opener. I still can't help but feel though that this is too late for some for the message to really hit home, and that they will probably end up appreciating it when it is too late, and they have learnt the hard way, resulting in physical and emotional damage, expense to them and others, injury or at worst death. The proposal made by the Association of British

Insurers for a minimum learning period could be a step in the right direction, but what has not been made clear is exactly what this period is, and what is involved. What is required is a minimum amount of hours with a professional instructor, rather like the CBT for motor cycles, and possibly include some off-road tuition to cover the basics before they are allowed on the public road. Even with full instruction, coaching, and dual controls, it can still be potentially quite daunting and dangerous with some pupils in the early stages, especially in more densely populated locations. I feel that other proposals such as curfews and graduated licencing are addressing the problems from the wrong direction. If the new drivers are not fully educated as to why they need to be responsible, then setting restrictions will not resolve the problems. They will also be extremely difficult to police, and there are enough problems such as not wearing seat belts, using mobile devices, and not having insurance that are still rife in our societies across

the country. We all see this going on around us on the roads every day. As the DSA knows, Pass Plus is very seldom taken these days as it costs more money, and why should they spend more money if they don't HAVE to, they've passed a driving test and got their licence after all? The same can be said for learning how to drive on a motorway too. We (ADIs) will always sell the safety benefits, but the take up of additional training, even with other incentives, is extremely rare. From the pupils that I have had come back for further training over recent years, it is quite scary how quickly a very good driver who passed their test with flying colours, very quickly picks up and gets into bad, and sometimes dangerous habits without realising it. At the moment there is absolutely nothing we can do to stop this. It is ingrained from a very early age to drive like everyone else, and not in the safest possible way. Other reasons I believe have influenced the drop in standards of driving on UK roads over recent years, that do not seem to be addressed in the consultation include: 1. Penalties to stop people from driving illegally (un-licensed and uninsured) are not tough enough as the penalties are cheaper than learning to drive and taking out insurance. It is becoming increasingly more common to meet people taking driving lessons that have previous experience through driving illegally. 2. Candidates are taught the bare minimum to pass the current test. This is not through choice of the ADI, but simply because it is nigh on impossible to get candidates to pay for the amount of training required for them to become a safe and competent driver.

If the customer thinks you are trying to make them take more lessons than they need to pass then they will go elsewhere. 3. Candidates are practising or learning with uneducated, non ADI, supervising drivers. As a result bad habits are instilled, which are hard for us as ADIs to break. 4. Pupils 'hop' between driving schools and instructors in search of the cheapest deal, and as a result have a very inconsistent learning period resulting in potential gaps in both knowledge and ability, although they might be able to drive well enough and commit no more than 15 driver faults within the allotted 38-40 minutes on a driving test. We receive a far higher number of enquiries from potential new customers that have already had lessons elsewhere than we do for complete beginners. The first questions they generally want the answers to is 'How many lessons will I need to get me through my test?', and 'How much is it going to cost me?' I can count on one hand the number of times I've been asked by the thousands of enquiries our school has handled in the last year 'What grade are your instructors?' or 'Are your instructors qualified?'. As we respond honestly to their questions and try to explain the reasons why realistically it is going to cost more and take longer than they are expecting, we lose the business as they ring around until they are told by someone what they want to hear, which is as quickly and cheaply as possible. 5. There isn't always consistency between the standards of ADIs' teaching or coaching abilities, as CPD has not been made mandatory as suggested many times over many years that it would be. However the new 'Standards Check' from April 2014 may address this to some degree by forcing ADI's to seek further training to reach the required standard. I definitely agree that the removal of role play for this process is correct. It is quite worrying the number of qualified and experienced ADIs that come to me for training having failed a check test, and only when we sit down and discuss teaching and coaching techniques do they realise that what they are doing on a daily basis has a large scope for improvement. Even then, as with learners, they only want to undertake the training they need to get them through their check test, and not spend more than they need to. 6. There is no central database or register available for the public to view to be able to make an informed decision on who they learn to drive with as there is for ORDIT trainers. Further more, there needs to be more detail

available, such as current grading, time qualified, and CPD, additional qualifications and training undertaken. Under the new proposals it seems that all of the CPD and qualifications that a large percentage of ADIs have been undertaking is going to count for absolutely nothing. 7. Non-regulation of foreign licence holders (EU) that have entitlement to drive here without formal assessment of training, when there is a possibility that their licence may have been obtained through a system that is inferior to ours, on roads that are very different, or even through false or corrupt means in their home country. I have had several recent experiences where pupils have claimed this. These are the pitfalls and concerns I have for each of the current proposed qualification process options: Option 1: Vocational training route ORDIT Trainers seem to be the ones that are going to lose out the most here, as the qualifications we currently hold (which is voluntary at our own expense yet governed and approved by the DSA) is going to cease to exist. Therefore we are going to have to re-qualify (at even more expense, the extent of which is still unknown, but looks to be in the £1000's) to continue using our expertise, whilst people with no experience in our industry, but hold the QCF accreditations can theoretically become assessors and trainers straight away without having ever taught someone to drive. This is especially concerning if the route of qualifying without teaching a real learner and being supervised is taken. It seems that independent sole trainers, or trainers that recruit in small numbers as their own driving school business expands (like myself) will be put out of business as it will not be financially viable for them to re-qualify for the new regulations, and as an 'Assessor' they will need to work in conjunction with an 'Internal Verifier'. This will mean having to work in conjunction with another 'Assessor'. The DSA have suggested a 'Hub and Spoke' arrangement with other Assessors. What the DSA seem to not understand is that we are in this profession as a business, and other trainers are essentially the competition. Another issue that the DSA representatives I have liaised with over this have failed to satisfy my concerns about is how the financial arrangements for the training will work, as there will be the costs of the 'Assessor', 'Internal Verifier' and 'External Verifier'. The only response that has been given is 'It is down to the Awarding Organisation to decide how the financial arrangements are worked out.' It is one of the DSA's concerns as suggested in the impact assessment to reducing the costs of training to a PDI. Surely this is now going to increase the cost of their training as there are now multiple people involved in the process, whilst not necessarily getting the hands on one-to-one training they will currently receive from the majority of good trainers. The only companies I see that are going to benefit from and be able to deliver this type of training are the big players in the industry that have the budgets, resources and personnel in place, and on a national scale. This seems to be extremely unfair, and detrimental to individuals that have been doing their utmost to improve the standards of the industry, when the short-comings in existing regulations and controls by the DSA as I detailed earlier in this documented response have been a large contributing factor of the current problems. The 'Exception by Application' to allow trainee instructors to teach for reward if supervised by another ADI for 100% of lessons delivered to a learner driver is totally unworkable as a trainer sitting in on a lesson is going to want paying for his time. Therefore the PDI is going to have to work for free, or charge the learner double.

Obviously neither of these are viable options. The only way this will be workable is if the supervising ADI is employed by a large organisation, like a national driving school with large budgets, solely as a supervisor. This again is a disadvantage to the smaller driving schools and independents as they are never going to financially sustain this as an option. Other problems I can foresee would be that the trainee would not get any work anyway, and pupils would not feel

comfortable with an instructor knowing that they are a trainee and having to be supervised by a proper instructor sat in the back. I can also envisage some less scrupulous driving schools avoiding the supervision being required by providing some free driving lessons by switching pupils between different ADIs and PDIs. This will again break up the learning process and lower standards. The only way PDIs can realistically gain experience is to operate as a normal ADI but with more tangible restrictions than 100% supervision. A better way for this to be achieved would be to enforce the current option of 20%, which could be increased to 25% or even 50% of paid for instruction supervised by an ADI, or even better an approved trainer. I have no data on this, but I would assume that only a very small percentage of PDIs currently indicate this as their preferred conditional option, as opposed to the additional 20 hours of training for the current Trainee Licence. The control, administration and management of this would need to be far tighter than currently exercised for ADI21AT Option 2: Reform the current qualification process If this route is chosen then training for the whole process needs to be provided by an approved trainer. Theory (Part 1): More emphasis needs to be put into the theory about the realities of becoming an instructor, like interpersonal skills, customer service, business running and administration, and safe driver coaching techniques, and the psychology of coaching. At the moment training for the ADI Part 1 mainly involves home study using the DSA recommended study material, and learning the answers to the questions found on the mock tests. Very few trainees, although advised to, read the required material in any great depth. A face-to-face approach for theory coaching (as I do with my trainees) will be far more productive in expanding their knowledge and attitude from the early stages. Driving Ability (Part 2): This should be longer so that a more comprehensive assessment of a driver's ability of more varied road types can be assessed in more depth, with the inclusion of commentary drive to demonstrate an advanced ability. Instructional Ability (Part 3): The Part 3 as it stands at the moment needs to be completely replaced with an assessment of an individual's coaching ability in a live scenario, similar to that proposed under the new Standards Check. However, I think there should be several assessments over a period of time, possibly with different pupils, with different needs and abilities. If this new Standards Check is good enough to test continued ability, surely it is good enough to test initial ability, and certainly more realistic than the current Part 3 test? Option 3: Keep the current process but scrap the Trainee Licence This is the least workable option for the same reasons described under options 1 and 2.

Summary: To summarise, I am in total agreement that the current systems of how people train and qualify as ADIs need to change, but the impact that it is going to have on a large section of the industry that are currently working hard to raise the standard needs to be looked into and considered more thoroughly, and utilising existing trainers currently on the ORDIT register by assisting their path to becoming a VQ provider, if indeed this is the route that is chosen by the DSA to pursue. However, I feel even more strongly that improving how new drivers are educated from a young age, coached when they come of age to drive, assessed, and then monitored once granted a full licence, is the only way that the standards of driving and road casualty rates in the UK are going to be improved. Without this being addressed, no matter how well ADI's are trained, we are fighting a losing battle as a large percentage of the people we are teaching do not want to be taught safe driving, but just how to pass a test as quickly and as cheaply as possible.

Ultimately standards of driving on the roads of the UK are going to continue to decline, unless

better controls are imposed on what new drivers MUST learn, together with HOW they are taught, and WHO they are taught by.

Too many people think that an ADI is a driving job. CPD about teaching and coaching will help people understand what is required

Scrap the trainee licence scheme. Stay the same the adi.

Qualification.with the dsa to keep the standards high. Private training with individuals outside the dsa will reduce standards .

You are never going to get enough adis to work jointly with pdis while they training.just make it obvious that the trainee is a pdicharge alower fee that would appeal to some people

I did a combined Fleet and Customer Relations course where we were told that no-one fails. Presumably this would have gone some way to getting me started to become an ADI. It would depend on what other training would be given.

Who will be the assessors of the vocational qualification? How will it ensure that candidates are suitable for the profession, considering the level of risk involved when supervising learners. Will Assessors be more likely to pass unsuitable candidates - there should be an initial assessment to see if they have the right traits to start with.

No 're- qualification' for existing ADIs.

I think that it will help the people who are serious about becoming a driving instructor as it seems a more rigorous and thorough way to train people.

Training an ADi is a face to face experience where the trainee is encouraged to ask questions. it also depends on the trainers' ability to "read " the trainee to angle the training to suit . Not easy to do in a classroom situation.

Only if an NVQ qualification is proposed do I agree. It will bring the Driver Training Industry into line with other training organisations

As an ADI, I see quite a lot of abuse of the PDI system. I receive a number of pupils whose instructor has "stopped instructing" when in fact they have not succeeded in their Part 3. I feel this is detrimental to the professionalism of the industry as a whole

This will probably allow exemptions and be mainly classroom based. The tests are ok, but need

an update

I am in favour of the introduction of a Vocational Qualification, as I believe that the ADI qualifying process deserves formal accreditation. However, I do fear the creation of a 'two-tier' system where existing, fully-qualified are disadvantaged in their business due to consumer confusion regarding the qualification and its value. I do support the suggested improvements to the Trainee licence scheme, since, from personal experience, I know of a number of individuals who have not been fully supported whilst training to become driving instructors, and have dropped out of the process due to lack of knowledge and support. I genuinely believe that this is the area which would yield the most substantial improvement to training completion rates. It is not the heavily-regulated qualification process which appears to be at fault, rather the support given to trainees and those awaiting a Part 3 examination.

Perhaps mandatory support / training intervals could be dictated between stages to improve completion rates? Incentives would probably be required to ensure that training providers comply. Perhaps the DSA needs to carefully consider existing ADIs in their equation. In one of my previous roles I worked for a University for several years, and 'AP(E)L' (Accreditation for Prior (Experiential) Learning) was given to people who had gained skills and experience in certain areas. It may be useful to assess and accredit existing ADIs for their previous / existing experience and skills. The DSA may wish to consider and prioritise its intentions - is it to clarify and standardise training, improve training completion rates or to make the qualification easier for the general public to understand, or something else? I imagine that an unsatisfactory decision would be extremely costly to the organisation. My past experiences working as a trade union official lead me to believe that any change to trainee / qualifying routes deserves (and indeed requires) further consultation, as this often improves the end result in addition to employee / trainee satisfaction, as they feel that they have at least been involved in genuine consultation. I have also found that proper consultation helps to avoid incurring further, unnecessary, costs.

On the whole, a good idea although I have reservations about those that assess the qualification. They should be at a minimum, ADI's with a QCF Assessors qualification and PTLLS L4 at least

There should be a clear accessible syllabus available to prospective trainees, and training organisations should not be left to filter the non realistic applicants. This will reduce the wasted time and money spent with all the training organisations offering ADI training.

Trainee licence holder should always be accompanied by a qualified ADI

For those candidates who don't make it through this would give them something that would hopefully be transferable to another trade

I would have a concern that the qualifying process may become 'easier to pass' and would like assurances that quality control would be in place to prevent unsuitable applicants from

qualifying.

It would mean that the failures or did not finish the course or tests may get something for the money spent. Which could be put to some other use.

This proposal eliminates problems of misuse of the trainee licence. The vocational qualification would also align with the National Standard for driver and rider training. The current high drop-out rate of trainee instructors is a concern. The vocational qualification would provide recognisable and transferable skills even if the trainee instructor did not complete the training.

if you introduce this qualification then stop allowing people to teach that are not qualified e.g parents and friends

It depends on how it will be run and tested.

It would put older ADI's at risk of being put on a secondary choice .

This Option takes no account of existing ORDIT trainers. There is a problem with allowing trainers to use their cars as their office. Needs to be an initial time (at least a week) spent in the classroom, this will give the prospective PDI a good insight into the profession and gauge suitability for a minimum outlay

The public need more protection and the industry needs to be more professional.

No review of the driving qualification process will change the KSI rates among young drivers until the skills and attitudes of parents and peers improves.

If this would enhance the status of the ADI as at present the DSA does not fully appreciate their worth.

this training will end up being based on profit not safety

What happens to existing ADIs

The Trainee Licence is, in general, not fit for purpose

Vocational training would be too easy to achieve. Formal structure for me would be the way forward.

I believe that the current part 3 test encourages candidates to focus on the test rather than actually teaching someone to drive.

Modula based like NVQ

The tests have always tested a wide range of knowledge from the theory through to instructional ability. The amount of knowledge needed to pass the theory part is demanding as are the driving and instructional ability tests. The trainee licence scheme is good as it allows PDIs to gain valuable experience without constant supervision which will restrict them in developing their own styles. This could be modified by saying that say 10% of the time they must be accompanied by an ADI thus ensuring teaching standards are being met and the instructional techniques are being developed. Over monitoring will prevent trying of new things!

MCI supports the proposal, but is concerned that the process to move the motorcycle training regime to a similar vocational framework, along with the ADI qualification and registration process, stalled during the period of the Motorcycle Test Review. We request that the DSA restarts this process. The standards required to become a motorcycle instructor and teach vulnerable road users should be at least as high if not higher as those required to train drivers.

As long as those delivering the course are stringently checked. Some VQ qualifications are extremely poorly administered at our local college

It seems that it gives you a better known qualification and can be used to further your career

It is late in the day for these changes, which I believe are badly needed to be able to be recognised by the public via a vocational qualification so they understand what the qualification covers, instead of trying to make up our minds on whether we tell them what grade we are or not, an NVQ would be much easier and closer to the times we are in.

Obtaining a vocational qualification will assist in professionalising ADI's rather than just by passing a test. Having a register will also assist this process. The Bus & Coach industry already operates a successful electronic register for PCV Driver Trainers which includes NVQ Level 3 and is operated by People 1st on behalf of the industry. The industry would not want to see any changes made to this successful register for PCV Trainers.

We agree a vocational qualification is good. But disagree the qualification will allow more PDI's to qualify - in effect, making it easier. Qualifying to give life risking tuition should be extremely difficult.

Having had experience of training organisations that are solely profit based I feel that option 1

would devalue our industry, i feel proud to be associated with the dsa and at the moment we have a test route that is difficult to pass but that in itself makes it more worthwhile and gives us more credibility, what option 1 proposes is that you turn this into a qualification that would be difficult to fail and would end up with training organisations looking for 100% pass rates as a sales tool for there business

Standards amongst instructors vary greatly, this would help standardise training and thus instructional standards.

this would limit training to specific organisations, as with fleet training these organisations corner the market and employ fleet registered instructors paying them far less than they would earn doing 'L' training.

Any nvq cpd already undertaken by Adi is also given same as newly qualified and older Adi have alo transferable skills

How is the vocational qualification differ from the current qualifying tests. Do existing ADIs have to take this too if it goes ahead?

Credit bearing qualifications provide wider benefits for those people entering and leaving the industry. They lower barriers for those with similar skills and this can enrich the diversity of techniques and transferable experiences. Those leaving the industry do so with a recognised qualification that may lead to alternative employment.

If doing a vocational qualification the standard will drop. The training might not be to a high standard. Keep it the same as it has always been

As an Verified in house by DSA and most ADI's accepted your assessment happily

this is like the GCSE qualification, O-level to GCSE in 1990, and now 2015 back to the OLD O-level style qualification. THE truth is that why trying to fix this ADI qualification system that is working fine, This proposed changes not going to make the road safer at all.

I believe the current ADI qualification process does little to help ADIs teach their customers. ADIs learn how to teach with practice after the qualifying tests.

The old system works pretty well , bringing in more levels seems to be just a money maker

Just because you can be awarded a certificate that you have passed the course does not mean that you can train people to drive. More pratical training at a better standard is required, ability to

instruct.

Like Open University with formal examinations and interviews/assessments

don't change things which aren't broken

I don't like the PDI idea, I believe instructors should be fully qualified to teach in such a dangerous environment, so training under supervision is all good & well but the ADI is in the back, therefore not really in control. A longer educational period under controlled supervision (ADI/tutor role playing as the learner poss?) until the new instructor is more than competent. Just my opinion.

I would think a "proper" course with defined standards can only be a good thing. Rather than in, some cases, a work book of sub-standard material from a generic source. Many of the problems I hear discussed in test centres come from misunderstanding driving, testing and the pupils ability. A "proper" course with a comprehensive syllabus is obviously required.

An exam is the best way to maintain improve standards

Having lack of time to investigate fully I can only offer that more time is required before a half baked scheme is launched!

As long as the tests involved are delivered by qualified people then there should be no problem

I have complete part 1 and part 2, but to date have not completed part 3, cannot for the life of me see why the current 2 year rule should apply to part 3, surely this could be extended to 3 years. I have not, and do not consider it necessary to apply for trainee licence. And the proposals would be in my view unworkable and extremely costly both for the PDI and the ADI.

Instructors should have some experience as a teacher/trainer before starting out as an ADI

A vocational qualification will be able to gauge the quality of a potential instructor far better than short, artificial tests

However I feel it is entirely unacceptable that someone could potentially gain the qualification, meet all the necessary criteria, but not necessarily be accepted onto the register. The DSA must not relinquish responsibility before the qualification process.

although I agree strongly with the proposals, I am a little concerned by the dramatic increase of the cost. of running an instructor training operation. Qualification to NVQ assessor and verifier

will cost in excess of £1000 and then there is the cost of becoming registered with the standards organisation running the show.

Assessment of practical as well as 'on paper' skills crucial

I agree that you should accumulate some points for future careers or training.

I have always wondered why ADI's do not require (or can use) an advanced driving qualification as part of their training. Surely, someone with a Gold award from RoSPA has all the skills required by the DSA, if not higher skills. Could this be used in the future as part of the credits towards the qualification?

As long as the qualifying process is not made any easier

Currently there are no set standards or structures for potential instructors to reach prior to attempting the part 2 and 3 tests.

I think it is important that regular checks be made on the people and organisations delivering the qualification to ensure there is no opportunity for abuse of the system.

The vocational qualification route is likely to increase the overall costs of training and could deter new entrants.

Think adi present in car for all paid instruction unworkable

here is some merit in the proposals but some very large risks and problems. There is a need for change and the main proposal of a vocational qualification instead of the current exam based system is a good one. However, there is a likelihood of a drop in standards of driving instructors, surely not the intended outcome. This would come from the assumed large increase in pass rate and lack of direct DSA oversight. I find it very surprising that the DSA are prepared to give so much control away to other organisations and I do not think they are fulfilling their responsibility to promote safe driving by doing so. I also think the terminology of training centres is misleading - training even now takes place in car and with the number of centres assumed as 50 in the new proposal the idea that there is some physical centre involved is misleading. Training organisations would probably better reflect reality. I would expect the current over-supply of instructors to get worse under this new proposal, given the increase in pass rate and this would create further problems with driving instructors trying to make a living. The costing assessment is terrible, relying heavily on PDIs saving money on training by the greater success rate. Costs applied to instructor trainers time are stupidly low and the threatened future ORDIT fees very high (does the DSA need to look at becoming more efficient?). It is interesting to compare the cost of a trainers time with an ORDIT inspection, say

an ORDIT inspection takes 2 hours of contact time, the DSA wants £165 (page 13 of Annex A) but a trainer gets £40 (2x£20) (page 12 of Annex A). The DSA should be embarrassed by these figures. I also think that the DSA should carry out the external verification role to maintain quality but the costings on page 19 of annex A are further embarrassment to the efficiency of the DSA - their costs are £1031 vs £350 for industry for a two day external verification visit.

As a general principal in costing, the labour costs of industry staff should be the same as DSA staff. The assumptions for PDIs are also odd, across the switch it has been assumed the number qualifying will remain constant rather than the number starting the process. The accounting only works because of the assumed drop in wasted training fees and I think this is a bad assumption if you want to maintain quality. I am also not sure that you can apply a cost to a PDIs time. If you want to save PDIs money from the qualification process, the correct way to do this is stop those who won't qualify at an early stage, something that doesn't happen at the moment. There is also substantial costs for training centres, yet it is acknowledged that it is unlikely they can recover the costs from PDIs, so where does this money come from? I know it has been pointed out to you that some of the largest training organisations have already been through administration and it is a necessary part of setting standards to ensure a healthy training industry.

Although working on a pink licence means you aren't yet qualified you will still have completed 40+ hours training and with regards to teaching the public still have to start somewhere. getting out on the road and gaining experience in a real setting is what counts.

I feel that over recent years the instructor industry has become over run with people who don't really treat the job as a vocation. Having a vocational qualification will wear out these sort of people.

Although the Pink licence may be good for those that want to be independent ADIs it is abused by driving schools that use it as a method of getting PDIs to sign up to many years of a bad franchise deal.

I'm not in favour of what i perceive is an easier way in. I only recently did it the current way and feel I have earned my place over the last 4 years - continuing to improve with self-study and CPD that i have financed. I am also fed up of EU interference in our society. Their driving standards are not hte same as ours in most cases.

Such a change will facilitate CPD.

It will damage the industry

It is almost correct as it is. You can over complicate a subject.

I am all for increasing our level of professionalism and skills.

I think this is a brilliant idea. I have known people who part way through qualifying have left losing the money they have spent to that date. If they get to take a partial qualification with them at least they will not have completely wasted their efforts. Also the proposed changes to the trainee licence in my opinion are essential; I undertook the trainee licence and was more or less just dropped in at the deep end with a live pupil without support from an ADI- upon reflection I don't think that my early learners received the tuition that they were paying for.

My concern from also reading the q & a from the webchat with the Registra that the pass rate is expected to rise sharply, indicating things are being made easier. My concern is for existing ADI's. There is already a saturation of ADI's in my area which is driving prices down, if even more people are joining the competition it affects existing adi's standards of living.

Training a person to teach is not enough. The subject needs to be learnt also. You would not let an English teacher teach science

I can see no benefit to introducing a vocational qualification either to PDIs or to the general public. There are many excellent individual ORDIT trainers out there who may have to stop training. I believe an improvement to the qualifying exams would ensure the calibre of future ADIs.

System works fine

In my opinion as an ORDIT registered DIT trainer the current system is fundamentally flawed as soon as the examiner goes into 'role' as a pupil. I find generally most pdi's struggle as it's not a real life pupil. There must be a better way to evaluate a pdi's skills.

At present, the current qualifying tests are stringent enough (as proven by the low, successful pass rates that go on to become qualified ADI), so why change it?

CONCERNED THAT THE NEW TRAINING ROUTE WILL DISCOURAGE NEW PDIs ON COST GROUNDS

The qualification will have more recognition over a wider field, not just in the driver training industry.

It should be remembered that the UK has a good road safety record, and the numbers of young drivers killed or seriously injured is also reducing so any change must not jeopardise this. We therefore feel the proposal in the consultation paper, to break the link between training and

testing by handing over the instructor training element to Ofqual, an organisation that has little understanding of road safety or driver education and whose priority role is not road safety, is a high risk strategy. In particular we are concerned with the assessment. Driver training is a practical skill, developed in a moving safety, critical environment. Assessment of driving competence and in-car driving tuition is a specialist area that is crucial to road safety. Whilst the impact assessment suggests that the cost of training to become a driving instructor will reduce, we do not believe this to be the case. The costs and resources associated with becoming a recognised training centre with an awarding organisation such as BTEC are significant. Few small companies are likely to be able to achieve this. Whilst there are a number of national training schools who train a large proportion of new instructors, many are trained by individuals trainers, many not ORDIT registered, who offer a highly personalised, and in many cases a superior quality course. For many of these trainers, instructor training is not the main part of their business. To suggest that they will be able work in co-operation with another similar trainer ignores the fact that such an approach would not be financially viable. It is likely that the outcome would be a reduction of new blood into the industry and in the longer term a shortage of instructors. Linked to the decline in recent years of people wanting to train to be driving instructors we could envisage a situation where only a few centres will emerge and these centres will have to command a high price to make it worth their while to maintain a course. These costs will be passed initially to trainee driving instructors who will then pass these costs on to learner drivers and other organisations they work for. In the longer term this will increasing the cost of learning to drive, possibly leading to an increase in unlicensed driving.

By having an vocational qualification this can be used in other employment roles if the person move to other job roles

Removing the ability of PDIs to earn while they learn will increase training costs. □ To reduce the drop-off rate, perhaps there should be an initial aptitude test, to discourage those that would otherwise fail, so saving them money. This would not find favour with some training organisations who do not offer partial refunds for those dropping out.

Its time that the qualification is treated professionally and not as a part-time 'job' or an extra way of making money

will existing ADI@s have to re-qualify, or gain an NVQ? If so, will they already have credits towards it? Will passing the new standards check be sufficient? The price for new candidates needs to be stricktly monitered so ensure they are now being ripped of by the training industry.

i would strongly recommend a chage to the current trainee licence scheme

It is very unclear what standard or level the vocational qualification would be. Additionally there are no measures for existing ADI's to have rights of equality or parity with the new qualification (ie "Grandfather Rights")

remove the trainee licence! it is used by larger companies to provide income NOT quality training to PDI'd & Learners.

Having a central body assessing PDI's would be more focused in maintaining high standards.

More info required to make an informed comment

Agree as I believe that currently too many people waste too much money 'training' to be an instructor - it will be far better to have training aimed at people who really want to become a good driving instructor by recognised good trainers and be able to really train proper driver training skills rather than just how to pass the qualifying exam - new instructors should become better instructors from the start

Depends on a lot of factors

Redesing part two n three tests

Vocational qualification will make more red tape,just like the old nvq, the new cpc and other training schemes, this is just a way to give big training organizations an income as they are the only ones who will have the set up to be able to run such training.

I feel it would need some practical and assessed experience aswell as just classroom style teaching.

Whilst we agree in principle, we have reservations regarding both the level the VQ is set at and also the quality and robustness of the AO and the monitoring of the VQ as these are not defined within the consultation documentation

I feel Teaching people should have a national recognised qualification. I have completed a City & Guilds Teaching Stage 2 a number of years ago, after qualifying as an ADI. The skills used in this course were useful not only in teaching people to drive but many forms of teaching. Also trainee students from a wider range of teaching techniques.

I would only consider this to be a valid proposal for the Pt3. Driving skills and ability can not be properly addressed with a vocational qualification. The trainee licence should be withdrawn. I think it is wrong that trainees can deliver paid for training whilst unqualified.

The current qualifying test is hard and it should be as it is an important qualification. The trainee licence scheme should be reformed.

Tri-Coaching Partnership Limited is an accredited Edexcel Centre and is already delivering customised qualifications at BTEC Level 3 and 4 in Coaching for Driver Development. As such we are in a strong position, experience-wise, to deliver a vocational qualification and we recognise the self-development that occurs as a result of completing assignments in order to achieve the qualification. Self-development happens not in the classroom or during in-car training but whilst working on their own and through self-reflection. Tri-Coaching Partnership would want to become an approved centre to deliver the vocational qualification for potential driving instructors. We would use ADIs, who have completed the BTEC Level 4 in Coaching for Driver Development to deliver the VQ. We have the facility to develop a three-tier system of trainers, assessors and internal verifiers. We would eventually consider delivering the training ourselves to qualify ADIs as assessors and verifiers. In the early stages, there are enough of our own trainers, who already hold the assessors and verifiers awards.

the part 3 test is not realistic, passing the theory and driving test should be compulsory.

It would serve to improve the public perception of the professional Driving Instructor.

teaching one to one is totally different than on paper

Many Instructors are belived to earn a huge sum of money, they forget that we want to Teach and provide a skill for life for all our clients. I believe the current system has allowed too many Instructors to teach only to earn as much as they can.

Hard to comment when explantion of type of training not given

if this new vocational qualification is transferable then i would agree

I am of the opinion that you have not fully explained 'why' you are proposing the change. There is more clarity required and, whilst there may now be clear 'NOS' avaiable for ADI's to review and use I still believe there needs to be more information made available.□If this went to a ballot I think it would lose...whereas not everyone will bother to respond and this may create a false impression.

The current qualification process is fit for purpose as long as delivered by suitably qualifies instructors: It does not need to be messed around with. Yes scrap the trainee scheme, this has been worthless and pointless for many years.

There will be a total upheaval to an already ailing industry. So many good people come into the profession but can't make a living and move on.

remove trainee licence

The consultation document leaves many unanswered questions so it is difficult to give an informed opinion

If it ain't broke don't fix it

Are the proposals change for change sake, or really required?

The proposal would engage the correct person(s) into completing the qualification and give those that have made the wrong decision something of value to transfer to another arena should they wish to.

I feel that the current process is of suitable difficulty and that relaxing this will allow more people to qualify flooding the market.

I believe there is a need to improve the overall education value of how pupils and instructors learn/teach. I am not convinced, however, that the DSA are the right people to do it OR that MDT is the right way forward, given this consultation which is ambiguous leaving more questions to answer than questions answered.

I can see problems further down the line as the consultation document does not answer all of the questions. I worry about the investment required by smaller organisations to become a recognised training establishment for ADIs and the protection that would be offered to the training centre if OFQUAL was to withdraw its support to the accrediting organisation if there is only one organisation. The cost of becoming a training centre would not be a viable option for many small organisations and therefore create a monopoly for the larger companies. There are already rumours that the larger companies will be able to apply for funding to offer this course for free which again lock out the smaller companies and individual trainers. There is also the potential to flood the market ADIs if there are no cost implications like the ADIs that have done the 'Fleet' badge.

Improvement in the qualifications and skills is necessary for the continued improvement and professionalism of the driver training industry

I agree in principle to the proposal for change and that the whole system is need of modernization and reform however there are many areas that are not transparent within the proposed changes and this remains so despite attending consultation workshops, webinars and reading through all papers

I don't know enough about the proposals yet

I think that this would be a fairer appraisal of abilities and potential; also I would suggest that consideration be given to existing experience in driving and advanced driving (ie IAM, ROSPA, emergency services). Given the amount of training they undergo and the levels they attain, I consider that prior learning should be fully accredited and go towards the qualification or, if sufficiently high, ie emergency services, exemptions and immediate qualifications should be considered. This is an area which is hugely lacking under the present system, in that no teaching qualifications carry across,

We DO believe there is a need to improve the overall education value of how pupils and instructors learn/teach. We are not convinced that the DSA are the right people to do it OR that MDT is the right way forward, given this consultation which is so ambiguous leaving more questions to answer than questions answered.

making the qualification easier will not, in my opinion, make better ADI's. tightening up on the use of the trainee licence is in order but allowing repeated use of trainee licenses should stop. I found that being on a trainee license was invaluable in my training to qualify as an ADI

Expertise lies with current ADI trainers (I accept that quality varies) and DSA, not with external accrediting bodies.

Unite disagree with any proposed change. It might need tweaking but the system isn't broken and doesn't need fixing.

Driving instruction as a profession is of a practical application therefore cannot be learned in a classroom situation. Teaching in a moving vehicle at potentially 70mph with all the hazards which a driving instructor may need to deal with on a daily basis.

I believe there is a need to improve the overall education value of how pupils and instructors learn / teach. I am not convinced the DSA are the right people to do it OR that MDT is the right way forward, given this consultation which is ambiguous leaving more questions to answer than questions answered.

Given the good road safety record of GB, breaking the links between instructor training and qualification, quality assurance and the driving test risks an adverse effect on road safety. Ofqual's record is not good, there would be a reduced number of training providers, reduced choice, costs would increase to the provider, the PDI and ultimately the learner with questionable benefits. Driver training is not rocket science, and is a practical skill that, whilst requiring a theoretical foundation, should be trained and assessed in car. If this approach were

pursued there would be no going back.

It Might make it easier to pass as such having unqualified/unworthy driving instructors

in the proposal you've written: learner drivers take lessons from a professional instructor 2 and that, on average, they pay around £1,500 for 50 hours of instruction each year. This means that an instructor charge at least 30GBP per hour. This is not true. I am an ADI from Slough, my rates are quite high, but some instructors around charge 20GBP or if you shop around you will find it even cheaper. This is not a good start of this proposal. Is it?

2. Bearing this in mind being an ADI is not an easy task. By introducing a vocational qualification you are taking the power of training someone who will be suitable for my business, away. Therefore this will eliminate an option of getting an additional client, who is interested in becoming an ADI. I have trained someone and by committing a lot of heart and attention this person passed all her ADI test first time scoring 5 and 4 for her Part 3 test. I know that in bigger classrooms you will not achieve this result.

3. Making this process easier for a PDI will not help the industry or safety.

4. Seems very complicated and involve a lot of bureaucracy.

5. In regards to:

- are accompanied by an ADI at all times whilst providing paid instruction
- inform the customer immediately before the start of each lesson, and in the presence of the ADI, that they are only partially qualified
- ensure that the badge of the accompanying ADI is displayed in the windscreen of the vehicle

PDI would not earn anything because an ADI would want their money plus I would charge the PDI for allowing them to teach my students. Also a student would ask for a discount. It would not look professional if an ADI would have to involve in the lesson or perhaps you would need to create an additional training for ADI to manage the situation. This will lead to more bureaucracy. We all know that person learn best on the job, also PDI is not a person they are well trained teaching bodies who passed difficult tests. (I like the idea of commentary driving on the Part 2 test!!!)

6. DSA should allow learners to be supervised only by professional driving instructors PDI or ADI not a parent or a friend.

providing that any person using that route has suitable qualifications to for the driving industry

The process of NVQ's is a process of introducing red tape documentation in a form of tick

boxing. It does not improve the training provided or improve the candidates learning or experience of what they are being taught.

Although sound in principle I fear the DSA would not be able to justify the costs involved with this option

The current scheme tests knowledge of driving and communication. It does not reflect the real job. How changes in technique are required for personality changes or route planning for example.

We need to improve the overall education of how Instructors teach and how students learn. Don't think MDT is the right way forward or DSA are the right people to do it.

I am concerned to protect existing adi from a forced push to get them at a later date !! to do the same as new instructors. □ this must be down to individual instructor

I don't feel that trainee licences should be issued without proper supervision such as a qualified adi present when pdi teaching

I will be interested if this qualification will also be made available to ADIs who have already qualified but wish to complete this for their own interest. □ I also think that it is very important that this qualification is set at the correct level.

Vocational qualifications can be seen as a soft option. Often giving much more time to achieve with little chance of failure. Often there is no final exam to challenge the ability of the individual under pressure. ADI's coach in a moving environment. Any vocational qualification must be rigorous enough to prepare an individual for these conditions. I fear a dumbing down of standards and a drop in road safety if the quality of the vocational standards is poor. Falling standards in our educational system have been evident where exam based curriculum has been changed to credit only. I agree that if a candidate does not complete the overall qualifying process then the part that have been completed will not go unrecognised by other sectors of the industry.

hands a large degree of responsibility to the private sector. make it more difficult and expensive for good independent ADI trainers to continue working.

It seems that there are two key objectives here:

1. To change driver training to be inline with the EU Directive
2. To ensure that the training provided is inline with the DSA's "National Standard for driver

and rider training”

These are reasonable objectives but proposed route to achieving them is tempered by irrational feedback from the consultative groups:

1. There is no evidence that learner drivers (customers) have any negative attitudes towards pink licence holders. We teach over 100,000 new customers a year and whilst our level of general complaints is low there is no difference proportionately between the level of complaints about ADI instructors and PDI instructors. Generally customer feedback is very high for both groups. It is completely unsubstantiated that the public have any kind of problem with the pink licence route.
2. The pass rate of trainee instructors on the DSA course is largely determined by the level of commitment and tenacity of the trainee. It is not overly difficult to qualify but many things lead to a drop out rate that seems high. This can be anything from getting a new job, illness, or perhaps a lack of appreciation that hard work is required. The paper states that in such cases, the trainee has wasted their money. That is the same with all training including university courses if the trainee does not fully commit to the course.

The Vocational Qualification

There is not enough clarity in the proposals to make any kind of reasonable assessment on the practicality of implementation or effectiveness of this aspect of the proposed change. Offering the trainee a transferrable credit in the event they fail the later stages of the training is a good idea so we would support that. Having an awarding organisation, approved training centres, trainers, qualified assessors, internal verifiers and external verifiers sounds not just complicated but hard to implement on a national scale and expensive. We are particularly confused by the notion that the trainer can also be the assessor therefore “passing” his own student.

The paper talks about training centres but at the same time says that most of the training would be delivered in the workplace. I suspect the thinking on this is not fully developed. Currently, training for the tests are either online or actually in a car. The provision of fixed training establishments has proven expensive on a national scale and in part this is the reason why training costs for the trainee have reduced in recent years.

Licence to teach for reward

A major advantage of the current system is the ability to gain real world experience as part of the preparation for the PART 3 test. Our trainees typically report that without that experience, they would have found the PART 3 much tougher. Teaching real customers is therefore an important element in the training programme. That said, PDI's have to have completed the PART 3 programme before they are allowed to operate as a franchisee. For many, the ability to offset some of the expense of training to be an ADI with an income from teaching is a key incentive. Without this, there could be decline in entrants to the market.

The Option 1 proposal is for an ADI to accompany the “pink license holder” at all times when the latter is teaching for reward. In addition, it is implied that the public would expect to pay less for the lesson. We think it highly unlikely that any ADI would settle for less than his or her normal

hourly rate which means that the only way this scenario can be financed is via the overall training course fee. The income from the customer simply wouldn't cover costs or allow the trainee to make a living. Typical training courses incorporate 60 hours of 1 to 1 training already at a deliver cost of approximately £1500. Currently, PDI can acquire countless hours of delivery experience through the pink license scheme and under the proposals we see that experience either disappearing or being prohibitively expensive. If nothing else changes, this may result in:

1. Lower pass rates
2. Newly qualified ADI's entering the market with no real experience.
3. Higher training costs.

We believe that the proposal to scrap the pink license scheme which has been running for many years is motivated not by a desire to implement a new system that has been thought through and proven, but rather based on personal vested interested. The market is tough and most ADI's would like an increase in lesson prices. The perception is that by effectively abolishing the pink license, ADI's would somehow earn more due to their being fewer competitors. In the very short term, that may work, but the DSA needs to consider that longer term strategic impact. The number of trainees entering the market may fall and in due course fewer ADI's will be available. Recession has impacted demand for lessons but the timing of driving license acquisition has been delayed in many cases not cancelled. Many of the better independent instructors are currently very busy as are Schools with a strong branded presence such as RED. Regulation introduced by the DSA also has to ensure the availability of reasonably priced driving lessons. Creating an unreasonable tightness in the market will not go down well with the public. That said of course, Option 4 includes the introduction of the VQ for which it has been stated that the expected pass rate will be 70%. We think the DSA should be mindful not to end up with a glut of poorly trained ADI's.

This option is fraught with danger. It would have a massive detrimental effect on the future quality of driving instructor training and thereby on the subsequent quality of learner driver training. It would have the detrimental effect of raising training costs and would place future instructor training into the hands of a small number of national training companies. The DSA assumptions on cost are very much underestimated. This option should be rejected.

if it aint broke , leave it

Evidence-gathering, modular assessment, take-as-long-as-you-like assessment ... anything other than "Summative Examinations" at some point merely dumb-down qualifications in the UK, no matter how loudly the proponents clamour

the information you have given is insufficient to have an opinion

The idea that candidates lose money and time by starting a course and not completing it is valid, however the main reason for this is inadequate screening to assess suitability and inaccurate claims of how easy the qualification is before taking their money. When some candidates find out the truth about how much work is involved coupled with lack of support when the companies have their money it leads to a very high drop out rate. The bigger companies refuse to give or claim ridiculous amounts in so called admin costs. Better instruction will not necessarily come from vocational qualifications. Especially self serving/regulated ones

I THINK THAT RECOGNITION FOR PART OF THE TRAINING SHOULD BE CREDITED TO REFLECT THE EXPENSE AND TIME TAKEN TO STUDY FOR PART OF THE COURSE IF THE CANDIDATE IS NOT WHOLLY SUCCESSFUL. TRAINEE LICENCE SCHEME IS INVALUABLE AS A TRAINING TOOL FOR THE PDI, BUT PUPILS MUST BE MADE AWARE THAT THEIR INSTRUCTOR IS NOT FULLY QUALIFIED.

Sounds like a good idea but this will form a two tier system with new ADIs against "old" ADIs. By making a new system that offers more, with a higher pass rate then there is a risk that the market will be flooded with ADIs. This is not good for either trainers or learners. Also this new qualification will undermine the "old" ADIs and make their achievements feel worthless. We worked HARD to get where we are but have no "paper" recognition.

I am ORDIT registered as a trainer and would prefer the tests to be carried out by highly trained examiners who have no interest in the candidates pass / failure rate and the exam pass requirements will be consistent. I feel the NVQ route could lead to candidates passing when they are not at the required level and trainers under pressure to pass candidates to achieve an overall higher pass mark.

NO

In the past 20 years the general education system has been feminised, this has resulted in a dearth of male role models and the total absence of male teachers from many schools. □ The result has been most beneficial to girls who have thrived under this system. It has not adversely affected middle and upper class boys because they have extra private tuition. Even the immigrant population has improved in educational terms.

Need to have more information about the vocational qualification and cost involved before being able to agree

I feel it would degrade the existing system.

A qualifying test for teaching someone to drive is all that is required.

Part 3 is a farce and unrealistic

What prior accreditations do you intend to recognize and at what strength.

There should be more supervised help when trainees are conducting lessons for a fee. Larger companies have for years abused the system as I found out while on trainee licence.

Allow LGV Instructors to match over parts already passed in their qualifications

This is not something you can learn in a class room. □ The way you are planning to do it will not work.

I have called for changes to method in which driving instructors are selected and trained almost since I began in the job and have been ignored by the DSA continuously. The requirements and knowledge to become an ADI are sadly lacking. Therefore I find the idea of a vocational qualification a very attractive one but the information provided is so vague I feel it is impossible to give an accurate and detailed response at this stage.

For example what will the modules cover/contain? How deep will the subjects be covered and what subjects will be covered?

As I understand it this option has already been selected thus making this consultation an expensive exercise in time wasting.

I approve in principle of a vocational qualification but we must always keep in mind that the end point is producing instructors responsible for training safe drivers. □ Standards of safety must be maintained.

I have no issue with this change as long as the standard of ADI's is not reduced

I already hold NVQ's taken with RTITB and this involved assessor and verifier certification, these qualifications were discontinued when DSA took over the voluntary register in 1997.

I have concerns that basically training someone to drive is a 'hands on' experience, along with suitable theory to establish that the learning has been achieved as a life skill, along with suitable attitudes are being formed. Generally, at present an ADI would deliver this training who we

would expect will have the suitable experience and qualifications to pass on all that is required for the new ADI. I totally agree that an overhaul of some kind is required and a fair number of ADIs do not obtain enough CPD to raise their own standards and this reflects on the standards of driving we witness. I do believe the poor standards are totally down to the ADI, the new driver is witnessing poor driving from the passenger seats from a very early age!

There is nothing wrong with the current 3 tier qualification process.

Some people are very good with theoretical skill but cannot impart practical skill to the same level.

Whilst we agree in principle, we have reservations regarding both the level the VQ is set at and also the quality and robustness of the AO and the monitoring of the VQ as these are not defined within the consultation documentation

The consultation is muddled and in many instances ambiguous, leaving me unconvinced that the DSA are the right people to do it. Neither am I convinced that "Modernising Driver Training" is the right way forward.

I'm not sure I understand the proposal really, particularly in regards the effect it will have on me! I do fear that the advent of a VQ will mean that those that don't have the VQ will somehow be devalued.

i think it will make the entry process easier than now & potentially allow less capable candidates to become ADI's

I dont believe the current system is being managed properly. If it was it would be perfectly adequate.

I feel that the current system works well

This will allow modernisation to be achieved, without creating a further plateau, with things being again "frozen", but able to develop over time.

It will flood the market with poorly qualified instructors

We strongly support this option because:

- MDT gives a fair opportunity to develop as an ADI

- It aims to reduce fall out rate for trainee instructors

Under the current system too many potentially good instructors have fallen by the wayside when having a "bad day at the office" whilst on test. Ongoing assessments are way more realistic

I need more information about the vocational qualification to make a decision on this.

I am very much in favour of this option and believe that it could lead to greater innovations in developing best practice. The current system which is focused on passing tests, does not significantly award individual trainers for making advancements in their delivery.

yes, many still train to pass the tests. but parts 1 and 2 are still relevant. Knowledge and driving skills.

the current system is adequate ,tried and tested.

Although I agree I don't feel there is much wrong with the current process

The consultation is ambiguous and isnt complete in the questions

depends on how it is implemented and who is doing the aassessing

It seems to me like you are making it easier to qualify. Bad idea

Ptlls level 4 or A1Assessors qualification

Making qualification easier is rarely a good thing

As a current non ADI trainer (police driver training) - I would hope to have an acceptable transferable skill set apart from dealing with novice drivers.

It needs to be more in depth information to rate the actual qualification and who tests you

I agree with this in principle but very little detail is available and I am concerned the lack of information could lead to a poor qualification process which is not robust and open to "tick box" exercise from those who are incapable of doing the job they are assessing. Would you get a Gas Safe person signed off by someone who is not Gas Safe themselves?

We strongly oppose the vocational qualification in its proposed format. Giving approved training centres the authority to internally verify their candidates for the Tests of Driving Ability and Instructional Ability is a potentially dangerous proposal and would have an adverse effect on road safety.

It be expensive for PDI to pay for ADI to sit in back and monitor are lesson. On trainee lesson, lesson price is already very less . If a qualified sit in back it will increase training cost

I feel that a lot more people will become instructors. And Dsa cannot possibly oversee all these training body's who will show a good example when being visited but behind closed doors will pass anyone and everyone, besides I feel that it makes a mockery of road safety.

A breakdown of costs to applicants and where training would take place. would costs and training be reduced and enhanced by online training.

We **AGREE** with option 1 however we do not strongly agree because this was not a unanimous vote. We have some reservations regarding the robustness of the internal and external verification process and would need assurances that sufficient safeguards are in place to minimise abuse of the system. We believe that teaching people to drive is in the main a practical vocational skill and not an academic one. We do not want ADIs to lose practical training skills and would expect in the main that assessment is to be carried out by way of observed demonstration. We see the potential benefits of introducing a credit-bearing qualification as bringing regulation and meaningful sanctions into a currently unregulated industry. Many potential driving instructors drop out during the qualification process and leave without any recognised qualifications. This may have cost them hundreds if not thousands of pounds. This is also the case with 'fully qualified' ADIs who may leave the industry with no credit-bearing qualification. These ADIs may cling onto their registration simply because they do not want to lose their investment. We also see the benefits of introducing a credit-bearing qualification for broadening the skills and experience within the driver training industry by recognising prior learning and/or experience and therefore attracting higher quality candidates by reducing the barriers for entry. In addition we see a credit-bearing qualification framework providing clear personal and business development paths and therefore encouraging ADIs to diversify; such as offering training for additional licence categories. This system has the potential to provide a firm foundation for producing higher quality driver trainers than the current unregulated system does.

We are strongly in favour of this option. Many professional trainers, whilst valuing the training process they themselves undertook to qualify in their chosen profession, would point to issues in the current process which a wholesale approach to redevelopment could rectify. Currently the ADI qualification bears little weight outside of the driver training profession and is not formally recognised as a vocational qualification within the national qualifications framework. It is also only recognised as a level 3 qualification which is A Level equivalent. We would like to see the

ADI qualification recognised at a minimum of Level 4.

In an industry where professionals manage both a business itself, and the delivery of the teaching process, you would expect the main qualification level to closer to be 4 or 5 which recognises management/supervisory expertise and experience (and when you consider school teachers qualify at level 6, if we want driver education to be similarly valued by society, driver trainers should be recognised as operating and delivering at an appropriate level).

We would like to see what the proposed mandatory units of any future qualification are, to be able to discuss fully what the best programme of qualification could look like for ADIs in the future.

Many members have suggested that a programme not dissimilar to the existing Diploma in Driver Education (which is already ranked as a level 4 qualification, is approved by Middlesex University and generates credits towards a degree level programme), with modules covering the core aspects of both ADI knowledge, business management and coaching and teaching strategies, could form the basis of a new vocational pathway. This would echo the qualification route within many other respected and regulated vocational professions as it not only covers areas of occupational competence specific to the driver training profession, but also delivers general business management and coaching competences – areas of learning which are not widely covered in ADI training currently, yet are core to their development. As many of the modules of this programme are already delivered by elearning this would not necessitate huge resource investment to implement and deliver. In car training, assessment and verification of training could then be delivered much on the same lines as have been previously discussed in the proposals.

We **disagree** with option 1. We are concerned that this option would separate testing and training in a way that would not benefit road safety. Many driver trainers complain about aspects of the service provided by the Driving Standards Agency however, almost without exception, ADIs believe that the agency and their staff provide a fair and honest examination system that is linked to testing.

The proposed system in option 1 will produce a huge burden on one person trainers and micro business. This seems very unfair when we have been told that the reason for dropping compulsory CPD was because of the burden it would impose on small businesses.

In the past driving instructor training has been provided by a wide range of business from one person to large companies. Most of the evidence we believe shows that the small providers had higher pass rates fewer drop outs and better results that is why we are finding it difficult to support a system that favours some of the poorer training providers.

We are also concerned about the way in which assessment might be developed for any new qualification in driver training. The assessment route already exists for fleet driver trainers and whilst we have no desire to cast aspersions on any training bodies we are concerned that few if any of those who attend Fleet Instructor courses fail to complete the assessment.

We also note the concerns of the Education Secretary on the subject of assessment. Speaking

in parliament on 11 June 2013 he said: “Both the Education Committee report and Ofqual recognise that controlled assessment, which counted for 60% of the English GCSE qualification, undermined the reliability of the assessment as a whole. It is proposed that course work and controlled assessment will largely be replaced by linear, externally marked end-of-course exams.”

With no alternative route to qualification being allowed under this option we cannot support it.

We are also concerned that breaking the link between driver training and driver testing in the way suggested would not be beneficial.

Disagree. We DO believe there is a need to improve the overall education value of how pupils and instructors learn/teach. We are not convinced that the DSA are the right people to do it OR that MDT is the right way forward, given this consultation which is so ambiguous leaving more questions to answer than questions answered.

We strongly support this option because:

MDT gives a fair opportunity to develop as an ADI

It aims to reduce fall out rate for trainee instructors

It adopts a 2 stage approach with transferable skills

It is aligned to the new standards which should improve tuition standards

It provides a career path for our instructors and trainers.

We have assumed for the purposes of this response that any ADI supervising a PDI would have additional training and/or skills allowing them to supervise PDIs. We would not agree to this proposal if any ADI could supervise a PDI whilst giving paid instruction.

Feedback on question 9

DSA is considering whether the external verification of a vocational qualification should be delivered by individuals outside DSA where they have the necessary occupational experience and are suitably qualified – paragraphs 60 and 61 in the consultation paper. How strongly do you agree or disagree with this proposal?

This will bring a variety of skills provided that suitable qualification relates to actual driving experiences

Really not sure about this

as long as the outside body is a national company to cut down on the need to travel

AGAIN TESTING OF THE SKILLS REQUIRES KNOWLEDGE OF THE SKILLS. OUTSIDE ORGANISATION'S WOULD BY THERE ATURE ONLY BE INTERESTED IN THE BOTTOM LINE.

Stricter rules means people who 'play' at being instructors would have to take a more professional approach to the industry and charge sufficient rates to 'run' their school properly (not just on a part-time/casual basis)

Could end up with poor ADI's and open to abuse

It should come under the framework as any Teacher who works in any school/college etc

corporate organisations only see their bottom line profits. The focus should always be on the quality of the qualification.

MORE EXPERT WHO MAY NOT ANYTHING TO DO WITH DRIVER TRAINING ON THE FORNT LINE

I believe it should be done by people who have the background knowledge of the industry from previous experience within the industry.

AnyDriver has made a mockery of this pocess. Any organisation can become an education provider. This element should be keep under DSA control.

Again the Big companies such as AA and BSM are going to have it all their own way and put

smaller business out of work. I have been training instructors to a very high standard for twenty years and was one of the first people in the country to join ORDIT. I am more qualified than any AA, BSM or Red instructor in Scotland but given these proposals my business will be finished overnight. More jobs for the boys !

I feel that anyone assessing an PDI's ability and understanding of instruction should have an understanding of teaching all age groups and levels of experience to drive.

Control should remain within the public sector. Easier to control standards and make changes in the future

From experience with the companies who have been allowed to offer courses on Fleet Training the level of assessment can be poor as income depends upon passing the candidate.

Having external providers will increase the cost and leaves the system open to abuse unless there is final testing on part

However I think the verifier needs to be one provided by the awarding body for the qualification, not somebody from the training centre. The danger of using somebody from the training centre is their pressure to pass the candidate.

As long as they understand the full process required and are not completely' independent.

I think the industry has people who are best placed to judge, outsiders may have bias

the question is experience

There still needs to be a regulatory independent body who fully understands how driving instruction is delivered in accordance with road safety

A private company would have a massive incentive to ensure that everyone that completes the training is at the acceptable standard, whether they are or not. This can be seen by the difference in pass rates already with delegated examiners. Also these trained verifiers would be the same people that are giving training just now and only achieving a roughly 30% pass rate. This option would give one company an unfair advantage in monopolising the driver training industry and would potentially cripple sole workers and competition.

The paragraph says it all, no one at DSA is suitably qualified to deliver it

As long as the EV is qualified

Doesn't make sense. Many new adi's have no pervious experience and are trained to an all ready good standard

I agree ONLY if these 'Individuals' are suitably trained to a high standard and that they are constantly monitored.

I have an NVQ level 3 qualification taken with a professional institution who knew less about the subject or qualification than I did and I'd never seen it before. I fear quality control will be lost.

I agree only as long as the verifiers qualifications and experience are of a high standard.

DSA has spent years training their staff so why change this now.i can only see this as a cost saving disaster.

I think ADIs should train new PDIs & that ADIs are better qualified to also provide check tests.

I think it would be hard to monitor for uniformity .

My reservations are in respect of impartiality and ethics. How would external verifiers be selected and monitored?

It is doubtful that individuals outside the DSA have the necessary understanding of the role of ADI's to adequately test them.

dsa has limited opinions

I do not agree with vocational training.

Who is going to control these individuals.The Dept.of Ed cant even control Exam Bodies.

Red and smart drive are not fit to deliver any of this training I've been trained by them before and it was well and truly sub standard by miles and there must be others

Our industry is being hijacked by bureaucrats that have no idea of how to do the job, in my local area the council have set up a scheme on savong young drivers lives and are attempting to tell instructors how to do their jobs, not one of the staff on the scheme have ever been on a driving

lesson despite many offers from myself and other ADI's to sit in on lessons, a complete waste of funds and time, we need less of this sort of intervention

Road safety should not be financially motivated as will be the case if it goes outside of direct DSA control.

To train all of the required amount of assessors/verifiers would take time. If people have the appropriate qualifications they should be able to fulfil this role.

I believe that current ADI's level 5 & 6 should be offered the opportunity to assess levels of competence prior to PDI taking various levels of qualification

This will have the same result that nursing currently has, people with knowledge but no way of using it. Nurses need to care about the people they deal with, i.e. it is not a job. Driving instructor should be the same. Unfortunately some large driving schools have been allowed to sell driving as a job hence some of the poor instruction.

As long as it does not just become another rip off by a few selected companies appointed to run the scheme

Although the individuals, outside the DSA, might have the occupational experience to carry their verification I fear that the process might be exposed some sort of "corruption" of the system.

As long as the verifiers have the relevant qualifications, ie ADI

In my experience training companies jump onto band-wagons and look to take advantage of funding pools as their priority rather than the quality of the training they deliver.

This should be done by trained examiners to avoid any chance of corruption.

It will be better for anyone assessing someone's ability to teach to have practical experience. Either as an examiner, or instructor.

Potential booking problems

Difficult to answer when we don't have any idea of whom the external verifiers would be.

Further to my comments at Qu8 it is essential that a totally independent verifier and, effectively, regulator is in place if this proposal is introduced since it is otherwise open to abuse in the

interests of short term gain for the training providers who than move on to providing other document based training for other industries.

I think DSA should retain some control over verifying the standards being met.

I strongly disagree with this as external verification is inherently inconsistent and open to abuse.

Using one source of verification would also mean consistency.

If a VQ is introduced it should be assessed and verified independently of the DSA. The DSA role will be to oversee the verifiers. Anything less is a conflict of interest.

Could this external method of verification be open to corruption? Also, with one organisation i.e. the DSA responsible for verification, a consistent standard can be applied to all. I know it would be cheaper for the Government to outsource this, but the need for consistency and credibility must supersede cost.

Many smaller schools can now pass on their knowledge easily to single of small numbers of interested persons wishing to become an instructor locally.

If experience in other industries has proved this effective then I would agree, I have not seen this evidence.

THESE SITUATIONS ARE ALWAYS OPEN TO THE PEOPLE WHO VIEW THESE AS STRICTLY A MONEY MAKING SCHEME AND NOT FOR THE BENEFIT OF THE DRIVER TRAINING INDUSTRY AND TO THE DETRIMENT OF THE GENERAL PUBLIC WHO WISH TO LEARN TO DRIVE.

As previously answered in question 7 this could result in a poorer end result.

I would always be concerned that the integrity of any external verification is sound.

as long as they are suitably qualified

IF WE USE EXTERNAL GROUPS OR COMPANIES THIS WILL END UP A DISASTER JUST LIKE THE 111 HEALTH SERVICE

The evolution of the DSA and the general examining base for ADI's means the expertise is worldbeating and should not be meddled with

Experience and qualifications are two separate things, anyone teaching an ADI should have the ADI badge themselves. This was agreed with CPD and should remain so.

Any verifier needs to have a full working knowledge and understanding of driving instruction,

I believe the DSA are best placed to provide verification impartially.

this should be kept within the DSA after all it is the DSA that conducts test...and i fear any complaints will not be dealt with ..as is the same with the theory test

No other organisation will have the focus, interest or experience than the DSA which sole purpose is to regulate and control driver training

DSA should stick to testing not training

If you were to consider such an idea, why could you not apply the same idea to the existing system. Thus allowing qualification through an external provider?

Care must be taken to ensure that profits of any such external organisation do not take precedence over standards. In practice this maybe impossible. A lot of good work by the DSA may be undone by subcontracting the work to an organisation whose primary goal is 'safe driving for life but only if there's money in it'.

using outside EV's would release the examiner for other task. Also to become an EV would mean some examiners would have to gain this qualification. More cost to the DSA.

If there is to be a vocational qualification it should be externally verified

Assessors of the DSA qualification exam should be independent.

DSA understand the system and should stay in control of it

better to have some one who knows the trade !!

The DSA does the job for the better of those taking part but outsiders will have profit their in their mind first and those taking part second if they are lucky!

driving is different it need tight control with no finical gain

I think it would be better of this was delivered by DSA and not an outsider.

There would be less bias.

he DSA are the issuing licence body therefore they should be the most qualified to ascertain a persons capability as an instructor.

I agree but I am nervous that these external bodies will 'cash-in' making the gaining of these qualifications financially prohibitive thereby maintaining the elitism that currently exists.

These organisation will they have qualification relating to driving, assessing, coaching and any other relevant qualifications.

Provided the necessary qualifications are in place. Whatever they may be.

I feel the DSA currently do a good job and I feel the DSA could only get stronger by educating their current staff to the higher levels.

As with Pass + it is open to abuse . The best verification is that of a supervising examiner with no conflict of intetrest. What is there to stop the external verifier also running training ?

Open to abuse of system for monetary gain

DSA should be doing this. Contracting out pushes the whole situation towards privatisation.

Who is going to vet them

Will these individuals be impartial individuals or people that work for an organisation with the industry, like one of the big national driving schools?

As this is appears to be a cost cutting / revenue generating exercise, no doubt the aim is to franchise the operation. I have no objection to this so long as individuals will be considered based on their skills and the large companies do no monopolise.

Provided that those verifying can show how it should be done

it is open to abuse financially and looking at the past atrocities with academic exam marking agencies...not convinced we aren't looking down the barrel again.

I agree that People that have suitable experience and prior qualifications would be good but not every tom dick and harry that has been a driver for a number of years then a union man or an NVQ assessor someone with valid prior driving instruction training

Would depend on the definition of suitably qualified.

Yes, definately, I believe this will lead to increased standards in the profession. It will force structural change upon the industry. This is to seen as a good thing. I would hope there is more visibility of who is providing the best training. For too long the instructor training industry has fooled new entrants, by taking their money and hopes in return for minimalist training. There are some excellent trainers out there and some form of banding should highlight the quality of the training provided.

As mentioned above the use of external verifiers would open up the exam to accusations of profiteering and lower the standard required for qualification. Proof of this can already be seen in the pass rate for delegated examiners in the HGV and PCV industries.

External verifiers should carry out unbiased assessment of the quality of training from an individual or organisation delivering the instructor training. The DSA already have qualified experience assessor i.e. their examiners who currently carry out part 2/3 test or ORDIT assessment. Why not utilise them? Should the assessment responsibility move to the qualification authority -other verifier would require to be trained and assessed to replace them. The assessor verifier should be independent of the training organisation.

Like everything there are pros and cons but one pro for external verification is that greater impartiality could be achieved.

No other organisation has the competence nor the infrastructure to deliver this process.

This system seems extremely complicated and there are too many people involved. the Idea of someone being able to qualify using qualifications gain from other fields seems good on paper, however, a teach looking to move over to a driving instructor will be used to a classroom environment and may not be prepared for the dynamic environment of teaching in a car on the move.

I furthermore disagree with examiner not being the same people performing Cat B tests. These people are uniquely trained in assessing Drivers and teaching methods. This has to continue

going forward.

Why do you not encourage people from within the industry? External people will not know the full job

I agree with this proposal, as long as they have an ADI qualification. It is fair to say, most drivers in the country believe, because they have a car licence, they are 'experts' in driving. (The amount of times I and my colleagues have been told we don't know what we are doing, as I am sure your Examiners have had the same). So, the ADI or an Emergency Services Instructor Qualification needs to be a minimum. Not sure about IAM and RoSPA. I know they have their 'Observers' and 'Trainers' qualifications but these are for their people who deliver training as volunteers. As admirable as that is, they are not delivering training as their bread and butter job.

If this proposal goes ahead, why not just leave the whole ADI monitoring process to ADI's. This to me looks like a money making exercise. Stop all Pt 2 and 3 Tests freeing up those examiners to do more standards checks which you will charge the ADI's for.

We believe that this would not be a problem and all new EV's would be interviewed and will have to show evidence of their occupational experience and qualifications.

I believe that the qualifications should extend after qualification e.g. the amount of years experience combined with the courses and updating qualifications

Only those who have had the necessary experience of actually teaching learners to drive, who understand the pressures of conducting lessons with real live pupils, should be able to assess whether someone has the correct skills and qualifications. It is a bit like someone who has never had an electrical experience deciding who is qualified to be an electrician or not, it is simply absurd. Even driving examiners who have had no real experience of teaching pupils by being ex-instructors should not be in a position to conduct a check test, or to assess suitability of a prospective candidate. There is a wealth of experience already in the industry, and many former instructors, or those wishing to change direction in the industry could be used for this task. I strongly disagree with external bodies that have no experience in teaching pupils being able to assess suitability or qualification for this task.

Best people for this job are DSA staff.

Will external verifiers understand if an answer is just plain wrong?

I agree with external verification by suitably qualified verifiers as long as it isn't Atos

Although good to use people with knowledge that may not exist within DSA, feel it might not be

consistent.

It is however open to abuse as is

This would be essential. The use of Assessors with job relevant experience and knowledge

I don't want to go this route- however if it did go the VQ route then I would see no problem with it being delivered outside the DSA

You will end up with the same poor quality training that is being allowed to happen now.

Private bodies are likely to be not as good as Dsa staff or Government department

Its fine, as long as there is a system to monitor them.

dsa examiners are highly trained and have an extensive knowledge of driving requirements

If the DSA has made up its mind why ask us for an opinion?

The least the DSA has in any organisation the better.

Again - quality assurance processes have not yet been detailed, so cannot tick 'strongly agree'.

If it goes ahead it should be overseen by The DSA not an outside agency.

Better knowledge outside to complement the DSA/government knowledge. Careful consideration and strict controls must be in place

THIS SEEMS TO MEAN PRIVATISATION OF PART OF THE DSA AND COULD RESULT IN BIG INCREASE IN COSTS

DSA as having responsibility for the standards of driving should take responsibility for verifying standards in training.

External verification leaves the matter wide open for bribery and corruption and becoming just a tick box if you have enough money.

There are plenty of suitably qualified people outside the DSA who could fulfil this role. Also, ex-

DSA staff may wish to take up such a role.

I am worried that external verification by individuals outside the DSA might cause troubles as those individuals might have "paper" qualifications and

little or non-existent experience on the practical field and therefore their assessment leans towards an academic assessment rather than having a wider view of the work done by the instructor.

Depends what experience they have with driver training

I think qualifications should continue to be monitored by the DSA to ensure standards and impartiality are maintained.

If a very tight control can be kept of the trainers then it would be ok. Otherwise it would be nice (probably not practical) to keep a training team in house.

We need internal individuals within our industry.

I think this is open to fraudulent behavior and when this was mentioned the DSA did state they would pick up on this eventually !

I think the DSA are much more qualified than individuals outside the organisation, no matter how qualified they are. Also, consistency will be harder to maintain if different outside organisations are involved.

As previously stated, an in DSA House qualification process would ensure consistency and remain focused to the specific task of producing quality instructors

Currently anybody can train a ADI. They could not be qualified to teach a ADI.

These individuals should come from an ADI/driving background

The DSA do not appear to have the time or the man power to verify the process

Stiff regulation on assessors as some could use their position not to do the assessment correctly

The external verifiers must be suitably tested by the DSA similarly to the current ORDIT test.

I agree with external verifiers but it seems unfair to the independant trainers who could easily be pushed out meaning that we could loose some very good and experienced instructor trainers.

They will be dedicated and thorough in there profession other than an employed Dsa employed staff member

When outside groups are invited it is impossible to regulate standards

Possibilities of corruption

More control of Instructor trainers would result in a more consistent level of training

This option is an absolute non-starter. Corruption and low standards will be endemic in this system because simple commercial pressures will apply.

Again prospective driving instructors will end up as qualified ADI's whether they meet the standard required or not and there is every probability that after qualification they will not successfully function as a self employed ADI.

ADI's need to be assessed by an organisation with no commercial axe to grind. That can only be the DSA for obvious reasons.

Belive the assessor should have a practical knowledge of what it is like to teach various pupils of all abilities

should be kept in house so to speak to maintain quality

i have personnal knowledge through taxi training and theNVQ courses they take that the courses are a sham

They must be qualified ADIs

The Dsa set the standards and they should apply them

Doubts about ability of external verifiers to assess to present or future standards. Well trained and suitably qualified DSA staff supervise delegated

examiners at present, why can this not continue

Outside organisations would be profit led and may lead to the social exclusion of certain

members of the public.

The use of external verifiers enhances the credibility of the qualification

I have no issue with who is the preferred supplier of external verification provided that the staff carrying this out are as knowledgeable and professional as DSA staff have been. I find it difficult to realise how this can be achieved.

DSA do not have the ability/skills or experience to manage this vocational qualification. It should be delivered by people already doing the job. I recently undertook a fleet check test and incorporated all of the new standards check criteria. The examiner didn't understand what I was doing with a client centred approach.

Many people feel better when they are not examined by the DSA. I feel some of the examiners from the DSA are too stuck up and at times speak and treat others as if they are better than us.

The DSA control the ADI Register. They should control any type of training as they do now.

As long as the individuals or organisations have had a number of years' service within the driving instructors side of the industry.... i.e. : ex –examiner, instructor .

My view would be for internal DSA occupational experience being a necessary.

I did mine at the instructor college separate to DSA

This is such a specialised role and should be kept within the Civil Service

It just seems to be taking a sledge hammer to crack a nut

External quality assurance/external verifiers would incur additional costs which would undoubtedly fall on the ADI/PDI.

Those with the necessary experience are already in the DSA. The DSA should use this expertise to get more involved not less.

No doubt they will have targets to meet and profits to make so would not be doing the job for the correct reasons.

External verification will result in an increase of poorly trained instructors qualified by tick box

training schemes (see fleet training system)

External verifiers must be carefully chosen

Experienced ADI s that is in years, and with good qualifications

The CPc is full of mistakes it is a joke to drivers they are paying money for a c p c card that offers nothing in return they corse is a joke they learn nothing

and lose money so DSA can cash in .training should be learning not sitting in a room watching crap of a instructor who knows nothing about hgv or Psv being in the transport game for the best part of my life I would say the DSA are using there position to gain money under false pretence

What constitutes 'necessary occupational experience'? In my local area ADIs can currently be check tested by DSA personnel who may have failed their ADI exams 3 times!

The standard will be compromised as like now there are trainers in audit that are rubbish

stop meddling

Again from past experience in other supervisory role staff were passing with vocational qualification that in my in opinion were not up to standard as the staff trained under the older system. This is a worry with this change.

I think this will take away some of the credibility of the qualification as with most training programs if it is put on the open market it will be ultimately discounted and manipulated to give you just a basic qualification.

They might be qualified in education, but have little or no experience of the driver training industry.

should be kept with inside the DSA only.

external verifier can manipulate the result for the interest of their company to make more money.

The overseeing of this is of vital importance and must not be of a similar poor standard of the DSA's overseeing responsibilities.

It lays the whole training business open to abuse by unscrupulous and unethical businesses. Companies will look to make as much money as possible for a successful verification.

The Driving Standards Agency should be in charge of all training, from ADIs to learner drivers.

Will the outside organisations understand the teaching needs that need to be developed for this industry

As long as the individuals have the skills & knowledge to do so. ADI's should have the option to teach if they have sufficient experience.

Joint effort maybe. DSA content and standards marked independently?

Maybe, but standards should remain strict!

You need ADI's who have practical experience to convey the knowledge required. Anybody can learn from books the information required but not how to teach for the individual needs of each pupil.

This is a serious option / consideration. I am a grade 5 Instructor for 12 years. Yet I can not get another job or career as a trainer. Employees /Industry do not recognise the 'ADI' as a qualification. That should be rectified.

This approach is consistent with the nature of the proposed vocational qualification

If the DSA are EV, then there could be some conflict of interest. It could be the DSA running the qualification and not the VQ supplier.

I feel the challenge here is consistency using external verifiers could lead to a high variance in delivery

I was a chartered marketer which was administered by CIM. The DIA or MSA could do that.

Reduce standards.

If kept within the DSA it will be easier (and cheaper?) to monitor. Once outside of the organization it could easily be abused.

Much would surely have to depend on the "occupational experience" of the external verification

organisation body

About time the dsa stopped having a monopoly including tests maybe we wouldnt have a 8 week wait for tests then .the dsa obvlously think this is ok

Your proposals are too lengthy to digest and too complicated to understand.

If it keeps the cost down compared to using DSA then that can only be a positive aspect.

If an NVQ is proposed then external verification would validate the award.

the verification should be done by the DSA

From experience I would prefer all DSA staff to be ex instructors. They have a better understanding of the job.

suitably qualified is too vague.

I think that external assessment is a pathway to consider, but only where the assessors can be monitored by a suitably open and transparent, supportive

regulatory body. Post-hoc quality assurances would need to be careful considered. The external assessors would obviously have to conduct themselves impartially and as would befit a member of DSA staff performing

the same role. This does raise some issues about suitable candidates for external assessors - what qualifications would be required, how could their

standards, impartiality and professionalism be regularly monitored, etc.

as long as they have worked in the driver training industry for a minimum of 5 years and have good record

Regulation of training and clear delivery should not escape the grip of the dsa again.

No problem as long as they are suitably qualified and have the necessary experience

It's unclear from the Consultation Paper how to avoid incompetent or corrupt verification. It would be better to have a DSA examiner.

as long as the competency of the individuals can be guaranteed and there are ongoing checks to ensure this is the case.

Could be construed as a "job for the boys" ie organisations corrupting the DSA for work.

There are risks to using external verifiers; they are not as accountable, standards may vary and continuity may be lost as contracts change. The DSA is a reputable organisation of some standing in the industry. Therefore

a qualification externally verified by the DSA would carry more weight and kudos.

I feel it is important to get a varied training ground to get a fair chance of learning.

I feel that the use of external verification undermines the relationship built up between the ADI and the DSA SE ADI/DTAM and would feel even more like a 'box ticking' exercise than currently.

The DSA has always set a standard that is rigorously monitored, any such external verification would be open to inept or corrupt standards

As long as they are not connected with the industry such as one of the big driving schools.

Only if an economical advantage likely

Specific skills and expertise are needed to produce an effective ADI. Too many vocational external verifiers would weaken and dilute the quality of instructors produced.

I feel that the same body should be responsible for the standards check and external verification checks ie the DSA

ADI with 5 years or more teaching/coaching

I should be very concerned about the training given and the experience in this field, of the external verifiers. There have been problems in the education system with different exam boards having varying attainment

criteria. I see this happening in the Driver training industry too.

External verifiers need to have knowledge of the role and the difficult situations that instructors find themselves in. So if the external verifiers have been instructors at the highest level for the

majority of their career before checking on the verification of others would be fine. Having someone who knows about driving and the law does not necessarily have the ability to assess someones practical teaching methods.

We believe that external verifiers outside of the DSA are best placed to quality assure vocational qualifications. They have education and training sector specific knowledge and have the benefit of experience of working with a recognised and proven quality assurance system. . They will also offer better value for money. Again we would support this route for motorcycle instructor qualification

They must have "on the road" experience too as an observer on lessons at the minimum

I have concerns as to the definitions of 'necessary experience' and 'suitably qualified'.

It depends on what qualifications the external examiners will be required to have, or what training they will be given,current DSA examiners would be ideal but then DSA would have a shortage of examiners making a bad situation worse.

Increasing the availability of professional people to assist DSA can only benefit the scheme and raise future standards.

This idea is simply too open to abuse. Our own experience has shown there are too many organisations and individuals who would be ready to manipulate this delivery method.

we need a body such as the dsa that is not strictly governed by a must make profit ideology as our safe guard within the industry

If we are working within the rules of the DSA then I think the DSA should deliver the qualification.

I think the qualifying test is fines as it is

I feel this should be carried out on a 'not for profit' basis

Dsa only

Who is going to verify the VC? Who is going to verify the verifier? I don't see anything wrong with the existing set up.

Tried and tested processes supported by robust quality assurance practices are already in place. These are trusted by other industries and the 'risk' of abuse is not a significant enough reason not to make this change.

The DSA should keep this as the standard will drop.

As an ADI we respect your decision, how many appeals did we have !!

This will fall into hands of big organisations.

Smaller driving school or individuals will be out of business or force to work for bigger organisations. □ Please look after small businesses.

this will not improve the ADI's standard but surly make it very expensive for new ADI to join (price them out)

I feel dsa needs to be involved in this because they understand how we work has adi's.

If the DSA want to get instructors to work to the same standards then the DSA should provide training. And then the costs would also be the same throughout the industry, and then maybe standards would improve.

External providers will be chosen by price over quality. There will be a lack of consistency. Auditing and issue resolving of adi's will be much harder to mange on both sides.

All you will get is a bunch to teachers trying to trian new drivers. We all know and see how instructors with the highest qualifications work, good theory but useless practical ability.

No amateurs though, local and county council staff for example.

Could a carpenter make judgements on a doctors profession.

I would imagine it does not matter who conducts the assesement, as long as they operate to the standards set by the DSA. My only concern would be that current check test assessors have a good deal of experience, and I would want to be certain that I could be be seen to be below standard, by a new assesement system wher the individuals a new to the system and dont have the same experience level.

Will b open to different teaching levels

I'm torn on this one, I believe 'outsiders' may have a more open/general view of training (which I'm all for) but DSA may be more specific to our needs? Can't decide which would work better.

How will non driving teachers know what evidence is good ?

The DSA will act for best practice.. Commercial companies will act for profit. Safety and quality first profit second..

standards may fall

Despite best intentions equality/quality will vary

How would the individuals be qualified? Is there a chance people like Richard Branson (for example) become involved & try to make money from something he knows nothing about ?

The qualifications and processes should stay within the remit of the DSA to prevent abuse and reduce the effect of the large "instructor factories" taking over

External verifiers are preferable to DSA staff, who very often do not have any experience of actually training drivers. However the experience of the verifiers must be relevant. □ I train fleet, green light, blue light and 4x4 on and off-road, but never have anything to do with novice drivers. I would expect to be verified by someone with like experience if I were entering the fleet market, rather than the learner market.

If the ADI qualification reflects the current fleet process then it could result in poor quality ADIs, the check test would result in failures and waste of time and money for the PDI and the DSA

it should be done by body like ORDIT registered establishments and checked by DSA

The DSA should have the skills to do this or gain them.

How will pricing be controlled?

Vocational qualifications should stay within the control of the DSA.

I believe that external versifiers should be used and have some practical experience of driver

training rather than examination.

I believe the verification still needs to be overseen by DSA who are responsible for driving and driver training standards.

fine subject to their being suitably qualified and fully familiar with the criteria required by DSA

Would these be trained by the DSA? if not, could the standards differ from centre to centre?

As long as the external verifiers fully understand the industry too

The verification process must remain professional and uncompromised in the public eye.

The DSA needs to control quality and therefore should be the external verifiers. I also don't see what an awarding organisation adds to the process - either the DSA or the training centres should seek this status under Ofqual.

Depends how much they understand regarding the ADI profession

This is a very good idea as long as the standards are kept up. The training organisations that deliver the qualification must be checked regularly to ensure the standards are kept up to.

This will only lead to an imbalance. If not at first, overtime. 'Too many cooks...'

Such verifiers will be impartial.

At present external verifiers do not have sufficient knowledge or experience to judge this sector

DSA has developed to cope with requirements. No person gain to DSA

Use the skills & knowledge of current ADI's

I am a little concerned that monitoring of standards may not be sufficient.

This is the way all other qualifications are verified; would give more recognition across a broader range of vocational qualifications.

I don't agree with the introduction of a vocational qualification in the first place.

Keep the process in house.

Always good to have an outside view

Does that mean any Tom, Dick and Harry can step in and deliver such tuition? As the motto goes, "if it ain't broken, don't fix it!"

The DSA are too blinkered in their approach, an outside body has more experience educational methods.

We are deeply concerned about the Quality Assurance aspect in relation to the recruitment, training and monitoring of the standards of the external assessors. The DSA, if these proposals went ahead, would in fact be handing over their responsibilities for Standards in this respect to the Ofqual. This could not be easily withdrawn if the system of quality controlled failed; this is therefore a significant risk that should not be underestimated. DSA are the only organisation that have the independence and expertise to deliver a national, uniform assessment or quality assurance inspection of driving and/or training being delivered in a moving, safety critical environment.

There appears to have been no piloting of the proposals and therefore no evidence showing that people completing the proposed new route will be able to pass the DSA's Standards Check. It is possible to envisage a system where the standards conflict with no organisation have overall responsibility for the system.

By having outside individuals who have suitable qualification this will help the system be more fairer

Such organisations will probably recruit experienced ADI trainers, giving a further career path.

Now that the DSA & VOSA are as one. To minimise expenses & to reduce redundancies, why not train excess staff to be external verifiers? Using external verifiers could result in favours being given to friendly companies. Using government staff should stop it.

i strongly disagree with any outside parties being involved with any proposed qualifications for DSA registered ADI's

The arguments used are very self-contradictory, in that DSA seeks to somehow transfer to

responsibility for measurement/verification of the new qualification to a body or "individual's" outside DSA, but who have the "necessary occupational experience". Such a statement more or less limits the establishment of a new qualifications entity to be populated by existing and former driving instructors. This would leave the evaluation of candidates open to bias and prejudice, whereas the DSA is seen to be above that.

Some external assessors would be financially motivated to fail trainees.

It is important to open minds rather than 'Brain Washed' approaches.

It will be fine for external verification so long as the verifiers all stick to the same requirements and are genuinely suitably qualified and experienced

Depends on a lot of factors

as my last comment, giving work to training organizations who only look at the budget not the quality

In the absence elsewhere in this questionnaire about removal of role play during check tests I would urge that role play is kept in on the following grounds. 1. Some ADIs may wish to maintain their registration even though not actively instructing at the time, hence having no suitable pupil to instruct. 2. A pupil may at the last moment pull out of the check test (for any number of reasons) leaving both the ADI and the assessor with an inability to productively use the time. 3. I have overheard many ADIs bragging about so heavily coaching the pupil beforehand so as to fool the assessor. Keep the role play option.

am not really sure how this would work. I assume they will be qualified ADI's as well as external verifiers

Recognised nationally by all forms of teaching professions.

The DSA maintain the register of Instructors, that said they should have suitable verifiers in place.

How can someone outside the DSA be qualified to judge.

this would not be easy for the DSA to facilitate, with potential numerous training venues.

As an Edexcel approved centre Tri-Coaching Partnership Limited has undergone three Standards Verifications and each time achieved a Grade A (excellent) for both our BTEC Level

3 and BTEC Level 4 qualifications in Coaching for Driver Development. We have been allocated three different SVs, all of whom have had the necessary experience in assessing the robustness of our qualifications and the procedures we use in administering ourselves as an accredited centre. We, therefore, have no problem with the proposal of using external verifiers and see no reason why these need to come from the DSA.

The DSA should still be directly responsible for the qualifying process.

The Driver training industry skill and knowlege resources would be wasted if it was only delivered by the DSA.

A body outside would overcharge and monopolise the training

Because of the lack of clarity in the Consultation document how can any of us answer this from an 'informed' perspective. □ There are so many variables in this statement that, once again, put this to a ballot and it will not be supported until you make it clear who, what and how this will be completed.

In order for the integrity to remain intact, all qualifications should be conducted by DSA

DSA are the best qualified and trained to do the job, why put it out to private (profit making) sector which will compromise quality for profit?

Why does the DSA and others want to waste all the experience that it already has? □ By outsourcing everything you will lose many key people who are currently the backbone of the industry.

DSA is the governing body and should retain control.

It really depends on what you consider to be 'necessary occupational experience'. Is this people that are already ADI trainers or maybe primary school teachers - there is a big difference!

Only people with a true understanding of of trade should be used.

To use suitably qualified people to complete the EV makes sense as would previous experience delivering within the industry.

The system should be government ran and checked as is at present

It is important to ensure that those who undertake external verifications are suitably qualified and have some formal understanding of actually what is involved with being an Approved Driving Instructor against teaching in a classroom where there are no external dangers from other motorists, i.a.w. paragraph 62 of the consultation. DSA have not supplied sufficient information or checks and balances for me to know exactly what is to be done by DSA. There are issues around how external verifiers will be audited, when DSA external examiners can't be controlled as their pass rates are considerably higher than internal examiners. This has not been well thought out at all.

I agree if this position is not abused and the external verifiers are officially appointed by the accrediting organisation. The cost of using an external verifier would need to be realistic as some are saying they would charge £170 day which is not a realistic figure for a training centre to pay or for a PDI to pay even if included in the course costs.

However what constitutes 'necessary occupational experience' and suitably qualified? this is as yet unclear. how this is funded seems a little unthought out and the DSA can see the advantages to themselves of not being responsible for this but the costing to gain a qualification, maintain a qualification, police the qualification, expenses etc will be considerable to the individual and have to be passed on to trainers and so trainees...how does this differ if it was to be internal compared to external?

This would appear to be both a fairer and more relevant idea in the current and future climates.

We would wish to ensure that those who undertake external verifications were suitably qualified and have some formal understanding of actually what is involved with being an Approved Driving Instructor against teaching in a classroom where there are no external dangers from other motorists, i.a.w. paragraph 62 of the consultation. DSA have not supplied sufficient information or checks and balances for us to know exactly what is to be done by DSA. We have issues with how external verifiers will be audited when DSA external examiners can't be controlled as their pass rates are considerably higher than internal examiners. This has not been well thought out at all.

In my opinion, only persons with experience in the ADI industry should qualify to be able to verify a persons ability to teach driving

Expertise lies with DSA. If external verifiers can also be trainers or assessors for other organisations, can you guarantee complete impartiality & fairness.□ DSA has expertise, and is completely independent.

This is effectively the thin end of the wedge towards privatisation of the qualifying process. This is something I feel should be kept under the responsibilities of the DSA

One of the major arguments with this is that there are many good educational institutions but to teach driving is unique. It's a speciality because the classroom is moving, as well as everyone else on the road. Unite therefore believe that it should remain with the DSA.

See reply to section 8 as a follow on a teacher who has only taught in a classroom situation cannot possibly transfer that experience to teaching in a moving vehicle at potentially 70mph with all the potential hazards therefore external verifiers should be drawn from people with that type of experience.

To maintain safety and credibility the training should be assured by independent driver training experts from within the new agency or the driver training industry.

Only people with occupational experience would be adi's

This will lead to more bureaucracy

This question is mute as to the previous answer to question 7. Why put more steps in to the process just improve/ police the system that is presently in place.

Although the DSA has written the National Driving Standard only to hand it over for others to assess, just with an external verification role doesn't fill me with confidence. This option is more to abuse from the pressures on performance and profit, to the detriment of quality, consistency and impartiality of assessment. If this is the way to qualify as an ADI, why is it not being touted as a way to qualify as a full licence holder?

providing both cognitive and physco motor skills are being assessed by individual. ☐ most relate to the learning part only

subject to the verifiers being above corruption or influence

The buck has to stop somewhere. We need a strong governing body such as the DSA to monitor and sanction where necessary. Too often organisations within the same industry cosy up to one another failing to maintain high standards. The only way this proposal could work is if the external body undergoes regular unannounced audits and if they are found to be failing or fudging the figures tough action taken.

In order for any VQ to have any value, it should comprise training in sufficient depth and testing to a fair level. We understand that the training centre (assuming this is actually a training provider such as RED) would provide the training, have assessors to test the trainee, and internal verifiers to check that the assessors are performing to a consistent standard. To give

the VQ credibility, it is proposed that the delivery of the training and the assessment of the results of the training are then inspected periodically by an external assessor. We understand that these could be either DSA people or a third party. The critical issue is that such assessments are fair, consistent and that any corrective action required is prescribed to a pre-agreed standard. On balance, we think this would be best done by the DSA rather than a third party

From experience with the companies who have been allowed to offer courses on Fleet Training the level of assessment can be poor as income depends upon passing the candidate.

These people have NO idea how ADI's work.

OfQual are specialists in education but the DSA are specialists in driving standards. Verification should be carried out by the DSA.

have been a trainer for 20 years, one of the first in the country on the ORDIT and fleet registers and 18 years of that with What was the biggest driving school in the country. These proposals WILL be massively abused. Example: my old company put every trainer through nvqs via internal / external verification. I gained that qualification one lunchtime sitting at a table with 4 other trainers filling in the evidence logs with the aid of a cheat sheet / what answers to put, and a disc of evidence to print out and insert, all supplied by the verifier. Every trainer for the organisation in the country did the same thing. Secondly, the larger companies will bypass the external verifier controls by letting their accountants create supposedly separate companies on paper. These 'separate' companies will then find it convenient to share resources such as premises/training rooms. Anyone who doubts that this will happen is naive at best. I worked for this company under 5 different sets of management / owners and we were always under pressure to manipulate figures and performance as the company needed. Fleet registration being another case in point. If the company needed fleet registered instructors to cover a contract we were told point blank that the would complete the course successfully or we would be out of a job. It will be purely a money making exercise for the big companies.

SURELY THIS JUST ADDS ANOTHER LINK TO THE CHAIN. THE DSA SHOULD SET AND JUDGE THE STANDARDS FOR DRIVING INSTRUCTION. THEY HAVE THE INSIGHT INTO WHAT IS EXPECTED IN A TEST WHICH SUPPOSEDLY REFLECTS REAL LIFE DRIVING. THEREFORE INSTRUCTOR TUITION, QUALIFICATION AND STANDARD TESTING SHOULD BE CARRIED OUT BY THE SAME BODY THAT IS TESTING NEW DRIVERS TO ENSURE WE ARE ALL WORKING TOWARDS THE SAME END IE SAFE NEW DRIVERS THAT REMAIN SAFE FOR LIFE.

The DSA need to keep control with anything and everything to do with driving standards.

The DSA currently do a fair and consistent exam and candidates pass or fail due to their

knowledge and training. It is essential the same standard applies to all candidates or it will be reflected when they sit their check test. This problem has already come up during fleet check tests as the candidate passes a course but is not at fleet standard. □I cannot see how external verifiers will be trained to the same high and exacting examination standard as offered by the DSA at the moment.

Would be worried about widespread fraud

These individuals must be of a driver training background

Are they going to be experts in classroom but no knowledge how to teach someone to drive

Need to have more information about the vocational qualification, cost involved and who would delivery it before being able to agree

In the DSA we trust.

This is just adding unnecessary cost into the system.

Current ADI's who wish to train in this area should be approached.

Their qualifications need to be judged on their driving abilities as well as their teaching/mentoring abilities

They are the organisation that is the standard bearer that we all adhere to when teaching

I am concerned with the ambiguity/vagueness of the qualifications of the verifiers, will they be experienced in the necessities of being an ADI on the road and the dangers inherent with the job? You say have the necessary occupational experience but fail to define the same.

If changes are going to be implemented, they should be positive, not just tinkering with a setup which we are not happy with.

I would be interested in finding out how to become one of these assessors

I do not see how business interests will not come into conflict with road safety standards. The DSA is an independent body that has total impartiality. The ability of the DSA to work with both large small business cannot be overstated. We would loose a vital independent body to work and communicate with. I do not feel that the unit cost of operating this scheme has been

correctly and accurately analysed, I see very high operating costs being transferred in the monitoring of this scheme, which can only lead to large companies operating. The idea that we have to work with other business to operate this scheme seems to be floored from the outset, there are so many ifs. □ I have always found the DSA to be fit for purpose and cannot praise examining staff and other individuals in DSA enough. □ I feel that the outcome of this new scheme would make it impossible financially and practically, I have been involved in driver training since 1987 and have trained in CPD throughout this time.

It should be kept 'in house' by professionals already in the industry.

Dsa examiners are best placed as they have full knowledge of the pupil demographic.

have reservations about exactly how new ADI's will be verified. Will there be a prescribed method or will it be the 'gut feeling' of the verifier. If the industry is left to decide the method of verification for itself, will it just adapt a sort of Part 2/3 model resulting in a less regulated and less consistent route that we already have? □ Are DSA confident of the level of knowledge and expertise within the industry as up until now the industry generally looks to DSA for guidance.

It is very important that whoever undertakes external verifications are suitably qualified and have more than a passing understanding of what is involved in being an ADI. Classroom teaching is at the other end of the spectrum from the very real dangers of on road teaching. i.a.w. paragraph 62 of the consultation. What is going to be done by the DSA is unclear in respect of checks and balances and how external verifiers are going to be audited. Doubt is cast because at present for example, DSA external examiners can't be controlled as their pass rates are considerably higher than internal examiners, (why is this?) A rethink is required here.

The more you put driving instruction into the hands of non-experts in DRIVING, the worse it will get.

This is a bad idea - potential external verifiers will not have the same expertise as DSA qualified people

At this stage when qualifying you are given a more level playing field with the DSA examiners. Yes you perhaps on occasions get a possibly better result with one examiner over another, but feel where different organisations are involved in time their interpretation could vary greatly.

Government agencies have grown accustomed to contracting-out. This is perhaps seen as cost effective, or "the cheap option". Do we really want a cheap option when it comes to driver training? I would also be concerned about the individuals employed by these organisations. My experience would suggest that they might include unsuccessful ADIs' who are looking for an "easier" job.

External verifiers should be used who have appropriate vocational expertise. We would envisage these being employed by the awarding body to ensure that standards are maintained consistently

We would be happy to support this proposal providing the correct level of competence can be demonstrated and verified.

Having a previous background in vocational training I support this role. I believe that award bodies have the expertise and the single focus on maintaining and improving quality. I could be incorrect but if external verifiers were to be part of the DSA I would consider that this would be a new focus of the DSA and one that they do not currently have the same expertise or focus.

there are already limitations on where the part 3 can be taken. will the outsourced qualification process create more limitations?

They have no experience in teaching learners, or drivers, or instructors

There are issues on how external verifiers will be audited, there isn't sufficient information from DSA.

concerned about different standards from different verifiers

but depends on who is going to be deciding on the assessors and not totally done by big companies who will use and abuse the system

External training companies accredited by edexcel or suitable body

This allows the possibility of one or all of the larger training organisations to effectively control the industry' which appears to be counter productive to at least some of the reasons for introducing changes in the first place. External verifiers should come from the ranks of the DSA as they have the experience and perceived / actual impartiality required to ensure that individuals together with small to medium sized organisations will have trust in the decisions being made. If this results in higher costs so be it! Furthermore I do not consider that this would undermine the authority of any outside awarding body as arrangements could be made prior to the handover of responsibility.

External verification would add credibility to any ADI process.

Again has to be A1 assessors

Although I agree with this in principle, it needs to be done carefully and with full accountability. Suitably qualified in my opinion is not someone who simply ticks boxes like an NVQ assessor who has little understanding as to what they are actually assessing. We work in a safety critical environment and are limited as to how much trial and error is available - this is unlike most other VQ processes.

I think that external verifiers are likely to be fairer, make better ☐ judgement & use more discretion.

Should the vocational qualification option be taken, we would ONLY support external verification by individuals with the necessary occupational experience. However once a driving instructor qualification process is placed into the hands of the Awarding Organisation, the DSA is unlikely to have much (if any) control or say over those chosen as External Verifiers or their experience.

External verification by suitably qualified individuals could be hard to police. How many areas will these individuals come from? How could you ensure the verification was consistent? If individuals come from different areas of expertise then surely each person will have a slightly different opinion.

My view is that only those in the trade know what is truly involved in educating new trainees. Those outside would only see training in an academic light ,which to myself would be a dangerous oversight in training.

We **AGREE** with the proposal to recruit external verifiers from outside the DSA as long as they can demonstrate an appropriate level of occupational competence and are formally qualified in the quality assurance of vocational qualifications. We do have some concerns surrounding how competition will work if there are to be multiple external verification providers and the monitoring of their qualification rates. We also note that the impact assessment states that “Risks around larger instructor trainers and pressures on quality of assessment mitigated by DSA role as external verifier”. Does this imply that the risk of poorer quality will be greater if DSA are not the external verifiers?

We would agree that it is practically necessary to look outside of direct DSA employees to recruit external verifiers as long as they can demonstrate an appropriate level of occupational competence, and are formally qualified in an appropriate vocational area. We would recommend and reinforce that there are a large number of appropriately qualified and suitably experienced driver trainers/driving training bodies outside of the DSA who would be able to carry out this role and either have an existing EV qualification, or that there is the ability to recruit and upskill personnel outside of DSA to carry out these roles. Not only would this capitalise on the existing skills and experience of expert driver trainers outside of DSA, but it would create additional employment opportunities for professional driver trainers.

We would not agree that this role should be filled by those with no experience, qualifications or expertise in the professional driver education realm i.e. those with generalist vocational verifier and assessor qualifications but no background in driver training. Any External Verifier should be clearly recruited, monitored and regulated by the awarding body/and or the regulator and the standards for their work set out by the regulator. Any awarding body will have to recruit from competent, qualified and experienced driver trainers to attain any level for quality and credibility for the verification process.

We **disagree** with the proposal to recruit external verifiers from outside the DSA. When option one was being discussed by DSA with ADI consultative groups prior to this consultation it was repeatedly stated that in this option the external verifiers would be DSA staff. The revelation in the consultation document that: *"The impact assessment has explored the option of the external verifier role being performed by DSA. However, it should be noted that this option would significantly increase the costs that would have to be recovered through the qualification. It would also compromise Ofqual and the awarding organisation's ability to exercise their responsibility for quality within the academic framework."*

This confirms our view that .Option 1 which would divorce ADI testing completely from the DSA is unacceptable. We also note in this passage the comment about the academic framework. Teaching people to drive is a practical vocational skill not an academic exercise, we do not want to lose our practical training skills in favour of a system based in academia.

Strongly disagree. We would wish to ensure that those who undertake external verifications were suitably qualified and have some formal understanding of actually what is involved with being an Approved Driving Instructor against teaching in a classroom where there are no external dangers from other motorists, i.a.w. paragraph 62 of the consultation. DSA have not supplied sufficient information or checks and balances for us to know exactly what is to be done by DSA. We have issues with how external verifiers will be audited when DSA external examiners can't be controlled as their pass rates are considerably higher than internal examiners. This has not been well thought out at all.

We would be happy to support this proposal providing the correct level of competence can be demonstrated and verified.

Feedback on question 10

It is proposed - Option 2 in the Consultation Paper - that we just improve the existing ADI qualification route (including reform of the trainee licence scheme). How strongly do you agree or disagree with this proposal?

As long as the trainee licence is reformed any other changes are fine by me

THE FIRST AND SECOND TEST'S CURRENTLY CARRIED OUT ARE ESSENTIAL, THE PART 3 TEST NEEDS REFORM AND PUPILS PAY FOR A QUALIFIED INSTRUCTOR , THEY SHOULD ALWAYS HAVE A QUALIFIED INSTRUCTOR IN THE CAR. PDI'S SHOULD NOT BE ALLOWED TO CHARGE PUPIL'S UNLESS THEY ARE ACCOMPANIED BY AN ADI. IF A MEMBER OF THE PUBLIC CHARGES IT IS A CRIMINAL OFFENCE

Pupils do not always know that they are often paying full price for lessons from a part qualified instructor, trainees should be accompanied

Trainees should not be allowed to give Instruction unless with a Qualified ADI in the car as well.

the present system is open to abuse. How many of the public even know their is a ADI Trainee Licence Scheme, they just presume every instructor is fully qualified and all have attained the same high standard. whilst developing the ADI structure it would be good to also reform the LGV / HGV instructor requirements. Again the public don't realise that it's not a legal requirement to be an instructor of a large vehicle. It's crazy really - making the ADI the best they can get and then allowing someone who passed their Lorry licence 3 years ago to deliver training without any formal qualifications (and potentially never using their licence over the 3 years they held it!) . Having strict instructor qualifications and path of development/improvement would help stop the cowboys and rogue traders!

No PDI's what so ever either supervised or not by an ADI

This is a very serious subject, it is something that people need for the rest of their lives, perhaps more so that things they learn at school or college. It should really come under the School curriculum or College.

in its current form it is abused by too many organisations

Check test where i did role play were a waste of time. if this is like the third part of test it does not test ability just quick thinking and they have rehearsed in advance. just like teaching pupils

to pass the test not to drive.

I believe the trainee license is a great idea as I used it prior to fully qualifying, the only problem that I had is that I had to trust what I was doing was correct, having a fully qualified ADI or the ORDIT trainer there to analyse would be more beneficial.

Either make the changes or do nothing. This would merely be 'tinkering around the edges', a waste of time and money.

Trainee licensing is currently a rip off. I agree that the qualifying test and check test system should be overhauled but not at the expense of putting individual businesses out of work

The testing system for teaching people to drive is tough as it is. It would stop the bigger schools teaching PDI's so they can earn franchise revenue and putting PDI's on the road before they are ready. There is a lot of pressure and exploitation on PDI's because of this, especially where there is a loan to pay off.

When I was going through the qualification process my part three test was cancelled four times. Holding a trainee licence meant that I could work.

No need for trainees/pink badges

This would'nt be much different to what happens now.

Who finances the attendance of the ADI at lessons?

trainee licence helped me on my way, can't fault it as long as you are well taught and monitored, as I was.

Get rid of pink badges

The trainee licence system has for a long time been subject to abuse by training providers and needs removing

This would ensure that the exam is fair and unaffected by commercial demands. It would also keep driver training under the auspices of the DSA which sets the high standards we already enjoy in GB.

More information required

DSA has failed to control the training regime for many years. It needs to be taken out of DSA's inept hands.

Make it an easier route to become an ADI

Licences should be reviewed regularly to ensure that Qualification of driving is not based on a single individual assessment

Why change what has been acceptable for years

The 'Pink' trainee licence should be discontinued. If the proposed vocational qualification does its job, there will be no need for it. Also, how many ADI's have the time to sit with a trainee? I feel it would be open to abuse...

I agree that unchecked & untrained instructors should not be let loose on paying customers without supervision.

I believe a more generally recognised style of qualification would be valuable to the industry instead of a generally not known and not understood type of qualification as at present.

train with another adi

The trainee licence scheme is in my opinion open to abuse. I think all trainees must be accompanied by a qualified driving instructor to ensure the pupil gets value for money.

The only problem I can see in this option is that a PDI needs to bring along a pupil to the assessment test. This means that every PDI needs to be "working" as an instructor on a trainee

licence to be able to have a suitable learner/pupil to bring to the test. Most trainee instructors don't work as instructors until they have finished their training and passed the part 3 test.

Something needs to be done to preclude some driving schools whose integrity is or has been brought to the attention of the DSA. Some schools allow totally inadequate PDI's to instruct pupils when clearly under trained. Although I went through the Trainee route, hand on heart I think it is far too open to abuse by schools who want numbers on their books so the trainee can pay his weekly franchise fees. It isn't just the pupils who are potential victims, PDI's are even more susceptible.

ADI Training is oriented to passing a Part 3 Test. It should be oriented to teaching Learner

drivers.

Certainly the existing route needs an update. Part 3 is the least "realistic" and needs to be more pupil related rather than seen as an exercise just to pass the test. It gives little incite at the moment as to what it is like to teach a real pupil,

I do not agree with the trainee licence scheme. and did not go down that route myself when training to become an ADI, most pupils prefer to be taught by an ADI, just ask the public..!

The current system is flawed. Dispose of the PSTs as they are not fit for purpose. Replace them with a less rigid system allowing the examiner to have more flexibility in how they assess the candidate.

Yet again as long as it is delivered to a high standard

Yes improve the qualification route, make it more thorough, a supervising examiner gets one hour to judge whether a PDI is suitable for a lifetimes teaching this test can be pre-empted by the trainer and practised many times beforehand, the trainee licence is necessary for good PDI'S to learn on the job but the test is inadequate, there is no easy way to avoid people loosing money on ADI training but please don't make it easier to qualify.

Part One is broadly speaking adequate though changes need to be made in updating the questions. Part two should have an element of actual tuition to determine a basic level of teaching before a Trainee licence is issued. Part three should take the form of a progressive lesson, ie, controls lesson leading to moving off as a proper lesson would do.

Why change?

Much prefer option 1.

Many PDI's do not seek additional training & development of their knowledge or skills required to enhance the pupils...therefore good realistic feedback from an ADI is paramount for continued progress thro their training period.

As long as they are also Experienced ADIs.

The pdi licence should be retained in some form instructors need to be able to coach/teach/instruct on a one to one basis without anyone being able to help.

The existing system relies too heavily on performance during a single test period of of an hour

when nerves are playing a part in the result - I don't think this gives an accurate assessment of an individuals ability to teach - in my own case I am achieving around 70% first time pass rates, well above average, yet I failed part 3 3 times due to my "allergy" to tests!!

If this is the case their should be more emphasis on what the job really entails rather than the PSTs.

There can be a problem of 'pink badge' instructors giving sub standard tuition.

The trainee licence is not suitable in today's training environment. ADI's sitting in the back is not feasible, who gets paid? PDI or ADI?

The trainee licence scheme is not valued, not conducted in accordance with the original intentions and the general public often are not aware that they are being trained by an unqualified ADI

This makes much more sense in that it will prepare PDIs to be able to teach real pupils to drive and will do away with the much maligned and fatally flawed preparing to teach PDIs to effectively teach an experienced person to drive and one that they don't know at that. My only concern would be that it is necessary to view them teaching at least 2 different pupils with one being a novice and one partially trained, each need to cover different topic areas and it is essential that these pupils have to prove to the examiner that they are indeed provisional licence holders. There is a risk that this could encourage PDIs to not learn all that they need but still be able to qualify but there could be a requirement for the partially trained pupil to have to drive on normal roads for at least 30 minutes in order that a broader assessment of training ability can be made.

This is at least an improvement on the current system.

At present the current system makes no attempt whatsoever to test a PDI's ability to teach before they are issued with a trainee licence. This is wrong. It cannot be defended that it is acceptable to issue a trainee licence to someone who could potentially be dangerous to be in control of someone's life. As BSM is no longer the happy retirement home for DSA staff then it should be possible now!!!!

I believe an entire overhaul is needed

I feel it is somewhat unlikely that many PDI's will undertake paid instruction because of the cost of employing an ADI on lessons. I therefore feel the DSA might just as well eliminate the PDI phase altogether

This half measure has no merit.

I think this is better than a completely new vocational course of qualification because I don't think there is too much 'wrong' with the current system of qualification. The main issue is that there are currently training institutions who are notoriously 'fleecing' PDI's for their money who are just not suitable to become ADI's. This needs to be addressed. My concerns largely relate this aspect and to the trainee licence. Too many PDI's have long taken advantage of the trainee scheme and pupils pay full price for lessons taught by a PDI who just doesn't have the experience. In addition PDI's don't tell pupils they are not fully qualified which is extremely deceptive. It is not fair on the pupil and not right.

However do not agree with an Adi accompanying Pdi on trainee license.

i think it needs modernising as it is not fair to everyone and some examiners are too strict with an if your face fits attitude.

Drop the part 1 include it the part in the other two tests

Although the vocational route would be good, I do not believe that this on its own will result in better training. The problem with the current training is that it focuses on the PSTs so the changes to the examination system will have a more significant effect on the training given. Option 2 will allow sole traders to continue to offer training thus increasing competition in the training sector.

I agree with an improvement to the part 3 examination process. I agree that lessons can be learnt in a parrot fashion way just to pass the test and this puts too much emphasis on the pst format rather than preparing instructors to teach correctly and to be able to adjust teaching methods for each individual. The pst format does not prepare instructors in route planning, basic control skills, planning lessons, dealing with learning difficulty's and many other situations.

THE EXISTING SYSTEM IS A VERY GOOD SYSTEM JUST NEEDS TWEAKING

The 3 strike rule is unfair for one

As above the Voc Qualification should be in addition to the current tests.
Trainee Licences would not work in the proposal as there would be no income to be made and the Pupil is likely not going to receive quality tuition.

Good idea as it will keep the profession, professional.

I do not feel that the current 3 test route gives applicants a fair opportunity to demonstrate their skills.

A better and more rigorous testing process would help to improve the industry. I would keep part 1 & 2 as they are and replace part 3 with something more like the check test but an examiner has to sit in on a number of lessons to demonstrate good all round knowledge not just a snapshot of ability as it currently stands. Sitting in on lessons for different abilities with real pupils would better demonstrate knowledge and understanding and how the candidate will handle the situation when they are on their own. I found it extremely difficult sitting next to an examiner and trying to imagine they couldn't drive or were only part trained.

Get rid of the pdi licence, what other professional occupation can you trade unsupervised without the necessary qualifications??!! And as for having an adi to sit in on the lessons, who the hell is going to pay for that?????.....the client?????!!!!!!.....seriously think it through

Add vocational qualification

Reform of trainee licence scheme: as per answer to first question; allowing any ADI to supervise lessons will not increase or even uphold standards and undermines the ORDIT register. It feels like a route to lowering standards of driving instruction.

It should be more Client centred learning focused

Trainee instructor licenses are not practical as trainee's are training to pass an exam. Teaching in the real world is different to passing a part 3.

There is room for improvement in the present system and the views of experienced adi trainers would be useful in reaching this level.

add the above psychological training and how people learn into the tests then still keep part 3

part 3 exam more equal to training a pupil .

make them answer for their failure rate and have a visible grading regime

If the present route is used correctly and not abused, it works very well.

The training and then test needs to be more like real life

I strongly agree with this initiative. I believe that the ADI route should be modular - perhaps similar to the three tests leading to the ability to give paid tuition but instead of the modules leading to that outcome they lead to credits that span both ability and educational qualities...leading to personal and professional development of which giving paid instruction forms a part and not the (perceived) final outcome.

All areas of driving should be checked and tested to keep our industry up to date and transparent.

PDIs are qualifying at present without the need for a rigorous course or assessment

The present system is too fragmented. A rigorous national checking scheme should be in place.

I believe role play should be abolished. It is not a true reflection of real life situations.

The idea of having a trainee teach the public for money is ridiculous. The one to one link to an ADI is a return to the system used in the 1970s before BSM managed to break the link. A trainee should have a qualified mentor and they should work together.

Vocational qualifications are not the way to go with this. I was involved with these in my former career and they are not worth the paper they are written on, so they will not improve the process as intended.

Candidate could simply choose a college and do the course at their own convenience.

What are your full proposals?

Yes improve the training to take the commercial element out of the system. Trainee licence is useful in so far as P.D.I. can discover before Part 3 whether they actually LIKE teaching driving!

If this option were chosen then the part 2 definitely needs to become harder by introducing a more advanced style of driving (mainly a longer drive covering more road types, and commentary drive). The part 3 however will need to completely change, with the scrapping of the PST's and a more natural assessment of an individuals ability to teach or coach over a period of time, rather like the new standards check, but over a far more intensive period, and a greater cross section of pupils.

The system works now. Changes appear to be being formed by large interested bodies that see a lucrative new income stream.

It doesn't serve the purpose it's intended to do. It does not necessarily produce driving instructors but merely people who can follow a rigid pattern of instructional techniques.

Trainee licence scheme has been abused as an enterprise to sell training courses with little regard to the overall needs for driver training.

this is also a good Idea but have you ever looked I live on a driver training route as soon as instructors have their qualification they learn the test routes then go round and round until student can do it blind folded the examination process does need changed

Such a move is slightly better than the current position. It will be missing the opportunity to something good. Yes. the public will be protected from unqualified instructors. Yes the big schools will not reap the benefit of milking trainee's for more money. It will do some good and is preferable to doing nothing, though I urge you to choose the vocational route.

A far better suggestion apart from the requirement for the PDI to bring along a pupil. This is open to abuse as it is well known amongst the check test examiners that this happens regularly. The DSA's official line that this would be unlikely is wishful thinking from people who don't conduct these exams or deal with instructors on a regular basis. At this moment it is possible to buy a check test lesson from various trainers (they'll even provide the pupil), this would more than likely continue if the DSA's proposal goes forward. The complaints that the DSA receive are to be expected from people that fail at something they are unprepared for.

I believe this would be the most effective and a simpler way to move forward with instructor training. It requires the proviso that there is a recognised qualification to become an instructor trainer. I believed that ORDIT assessment was going to become mandatory. I think that would be the simpler way forward. In most industries you get an opportunity to put that training into practise - teachers, doctors, nurses etc all get experience prior to qualification. Continuing a trainee licence scheme would allow potential instructors this opportunity to practise. The scheme would require to be policed because it has been abused. I don't think the the proposal of all lesson delivered by a trainee by supervised is viable.

I believe the current qualification process is fairly well structured as it is. It is simplified being in 3 parts but I do believe it has its drawbacks. I believe it does put pressure on a PDI to qualify as an instructor under the current Trainee Licence Scheme. Like ive said in previous comments its a skills based job so I believe it should be more about integrating into the job and developing skills to go it alone. Basically I feel more on the job learning would be of benefit.

Increased minimum numbers of hours for Part 2 and 3 are required. DSA could review comprehensive records of training before issuing a trainee licence and this would be conditional on continual training until the internal verifier signs them off and then a standards check could be completed.

Too many trainees are signed up and hit the road without any supervision and little initial training

Again, The requirement to have a ADI present for a PDI to provide a lesson for reward is not practical for Monetary reasons. □ Furthermore, a PDI can not be required to provide a student for qualification purposes as should the test not be successful, the PDI would los

Work with the new Pdl get them a better understanding of what they need to do once they qualify, not just leave them out there on their own, keep supporting them

Having worked for a large well known company who delivers ADI training and runs a driving school, I am well aware that the Trainee Licence has being seen as a licence to make money for companies. PDIs have ended up more concerned with earning money to pay their franchise then using it to gain experience. When I was a Field Manager for that particular company, once a t a meeting, a question was asked by our Manager (Marketing person, he was never an ADI), how much more money can we get out of PDIs? Either the Trainee licence is abolished and the training takes place as suggested with an ADI observing from the back seat, while the PDI instructors a learner or full licence holder, etc, or you keep the Trainee Licence. Some sort of financial cap is placed on franchise Fees so companies cannot milk the PDIs, therefore the PDIs can focus more on using the licence for experience. Again, ADIs sitting in and observing would be beneficial. When I was a BT Engineer, we were trained first, then worked on lines, etc, while under supervision. It could take up to a year before we were qualified.

Keep within DSA to make best use of the skills and talents of DSA Examiners.

I will not carry on Training Driving Instructors under the Vocational Route

The trainee licence is an important introduction to 'real' teaching. We should be able to keep it, but insist training thus given is free/discounted.

To give lessons when not fully qualified is strange, although of course this is what happens to trainee teachers but observation by qualified petsonnel would be good for the public

There should be no trainee licence

Although for many, the ability to be able to learn 'on the job' is crucial to getting the knowledge and understanding required, monitoring and the the quality of subsequent training has always been an issue to avoid trainers being left largely unsupervised

The "Pink Badge" was a good system but sadly abused and mismanaged.... if controlled correctly then we should have a reform

People WILL prepare a 'trainee' pupil for their standards test, so then we're relying on the opinion of the assessor as to whether that has happened. If an assessor and ADI don't see eye to eye, there is too much scope for the assessor to mark down

There must be opportunities for trainees to progress. Even medical junior doctors are allowed to work while they are on training. Why is this different?

The standard of new ADI,s is very poor imo I qualified 30 years ago and to me I see new adi,s teaching basics so wrong.

It is cumbersome, old-fashioned and not strict enough. The qualification must be tighter in control to only allow suitably gifted people to train young drivers.

I don't think that is a very long term plan, I see no reason why ADI's should not qualify in a similar way to other professions, many of which are using more vocational methods.

The current route clearly isn't working and an overhaul is required.

The trainee licence scheme is a good way to gain real experience - where else? The abuse of it should be stopped, e.g. trainee licence holders working a full diary - it should be for experience only - a few hours a week is sufficient.

I fully support that the existing ADI qualification is improved but I would prefer to see the trainee licence to continue

More CCL would be more beneficial.

I think this could also work

When you have mature persons training to become a ADI they usually have commitments Mortgage Rent Family, remove the Trainee Licence and then you may have only a limited

audience.

Depends how you intend to "improve" the existing route.

The existing qualification process is still fit for purpose. It needs updating to match the changing needs of the industry.

Trainee licenses should be stopped. Passing a part 3 is different to teaching when you are a PDI.

I believe the current system "weeds" out those that think it's an easy option for work and shows that hard work and dedication to training is required

Improving the "realism" of the part 3 test making it more like a check test would be a good step forward. The PDI changes are also a positive step.

Make British roads safer with proper trainers, rather than instructors out to make money

The trainee licence requires an overhaul to stop abuse of the system

I have always felt an unsupervised trainee instructor to be vulnerable to poor instruction due to being left on their own

Believe the the experience of a trainee licence is very important. You're going have to teach on your own at some stage.

The DSA must be responsible for testing potential driving instructors. This is the only fair way to maintain the standard of ADI produced. ☐ Reform of the trainee licence scheme is difficult and expecting a learner driver to accept tuition from a trainee instructor without a financial incentive will be difficult. ADI's will also not readily expect to spend their time babysitting a PDI without a financial incentive or without a premium fee being payable. I have seen no evidence that trainee instructors qualify more readily by working as a PDI with real learner drivers as opposed to taking role play training from an ADI up to qualification which leads me to believe that the trainee licence scheme should simply end and that ADI's should continue to be able to train candidates with the DSA continuing to decide the standard required through testing.

Changing the system mainly to increase pass rates of ADI's seems a strange option

If an instructor cannot qualify after six months practice they should not be in the industry

the existing route provides a knowledgeable candidate at present

This would be better for me personally I think from the point of view of an independent ORDIT registered trainer who isn't seeing how the vocational route would affect us

No opinion really but you need to make sure that ADI training is reputable and not just a money making exercise

In our view this would retain confidence in delivery of the qualifying process by DSA staff whilst producing the required improvement in overall standards. The appalling pass rate for Part 3 is, in our opinion, due to the poor standard of training delivered by some organisations taking on students who clearly are not suitable candidates. In essence, why change the qualifying process significantly when standard of training should really be the issue

Why not issue PDI after part 3 test, and then introduce a check test (part 4) after 6 months. If successful at part 4, then apply for ADI.

The current system has worked very well for me in the past, as a PDI, and once qualified as an instructor trainer. The ORDIT qualification I then obtained seem to lack realism by constantly referring to pre set tests, this is why I conceded this qualification after a few years.

I'm against a trainee licence without an ADI present in the vehicle. So this option is the best in my contention

Scrap the trainee licence. It didn't help me pass my Part 3. Three years after starting the process I am only now just started with a Franchise and have more pupils than I had at the start of my trainee licence. You can concentrate on the pupils now rather than worry about your Part 3 test.

I think it is vital experience learning as a PDI/ on the job real life experience . Rather than just passing the exams in a class room environment, then just going straight out an teaching a live pupil for the first time.

the public(pupils) must be protected, all trainee's should be supervised by a qualified ADI when taking part in tuition

The trainee licence should be abolished.

This seems to be a more manageable route for individuals to take.

Do away with the Trainee Licence completely as it seems to cause more issues than it is worth. Students would then be in no doubt that their Instructor was fully qualified.

The PDI licence gives valuable experience, it has been abused, so why not cut out the abuse and keep the good bits, if a DSA test was introduced prior to the issue of a PDI licence it would stop the abuse The proposal for for ADI's to accompany PDI' is commercially unviable.

Needs attention.

Again if it anit broke why fix it your only trying to justify making money out of it

I qualified through the trainee licence scheme. The quality of driver training afforded to me was not great, and the trainee scheme helped me to qualify.

nothing wrong with it

I believe this would make a very good option with more relevance. It would also employ an already in use system saving the need for to much of a radical change which would involve a lot of cost to both the ADI and any restructuring process involved.

Trainee licence must be abolished since it is widely abused

Not sure - will go with MSA. However, I feel that the trainee licence is a good idea if properly activated. I would like to see 50% of lessons supervised by the trainer.

Trainee licences are not supervised

The existing qualifications are far more fit for purpose than a vocational qualification. If people are failing to complete the course, this is because companies such as RED suggest that "all you need is a driving licence" and that being a driving instructor is a lucrative and flexible career. People who start to train to be an ADI may well not have the intelligence, personality or ability to qualify.□Improving the qualification process to better reflect the current teaching methods and national standards is a logical step. It should, at least, mean that those who pass Part 2 are proven to be "advanced drivers", perhaps by working with the IAM or RoSPA.□In addition, the trainee licence allows people who cannot effectively teach to train people to drive. This makes no sense. It also is exploited by many driving schools in a way that is highly unethical. The customer MUST know if their instructor is a trainee.□Personally, whilst I did benefit from the trainee licence myself, I would abolish it entirely.

I believe the trainee licence is still a good way forward to qualify,conducted with an Orit

approved or grade 6 instructor.

how does this affect the lgv driving instructors?

The current training is not good enough as PST's are not showing enough of the skills of the current PDI

es improve the part one by not printing the questions, by making the PDI learn all relent material. A vocational qualification that is recognised would great. Get rid of roll play on part 3 and introduce real pupils, but the examiner should chose the subject he should teach so no preporation can be made by the PDI thus showing his ability to teach any subject as if it was the pupils first lesson.

Something has to be done, the part 3 is farcical, the Examiners who conduct it, take the roll play exercise too far.

This represents an improvement on current arrangements but it does not create the 'standards-based' solution provided by Option 1.

I agree with the PDI having an ADI present during all the teaching that takes place. However I fail to see how much practice a PDI would gain in this scenario as really it would only be friends and family that would agree to such an arrangement. If a member of the public is looking for lessons I can not see that they will be willing to learn in this way as it will take considerably more. The ADI needs to learn a living and would the learner be willing to pay ADI rates in this situation.

Radically change it

Its hard enough now

I believe that there are many sub standard ADI's in business

The trainee licence does need more guidance. I personally entered the ADI profession in 2003 via the trainee scheme but felt that it wasn't necessarily the teaching I was giving that helped me but the extra study I put in outside the practical lessons that were essential to understanding how to teach.

What is the purpose of changing, Change for changes sake?

The current system is out of date with modern qualification methodology. Any proposed system

should be able to demonstrate to the general public that a nationally recognised qualification has been achieved.

External training should be formal and monitored by the dsa, not left to inflated learner training businesses.

I feel that a trainee licence holder requires some sort of support from a qualified ADI during the process of qualification.

the trainee licence has been misused for years mostly by big franchises.

I dont feel this will address any of the areas of concern with the way that driver training is currently delivered.

two questions in one here. ☐ The pink badge scheme is simply out of date and should be dropped. ☐ The method of tests keeps it simple without complicating the whole procedure.

Option 1 is our preferred option as we feel that the introduction of the vocational qualification will be of most benefit. Improving the current tests would be preferable to the do nothing option or option 3.

PST's already used are outdated and do not represent modern driving situations and the general attitude of todays young drivers

Needs to be an initial time (at least a week) spent in the classroom, this will give the prospective PDI a good insight into the profession and gauge suitability for a minimum outlay therefor reducing dramatically the dropout. ☐ The ORDIT register should be compulsory.

This will stop the industry having a bad a name as most of the public would not know how to recognise a trainee.

Only if an economical advantage likely

The system as it stands is fine. The PDI option just needs to be more supervised (in car during lessons given by the PDI) and made more transparent to the general public.

How can the PDI earn if he is paying a ADI to sit on lesson?

Updating of the process has been done over the years and this can be continued. The route

ensures that those who want to be instructors focus on each element to ensure they reach the qualification and they are monitored.

We would not support this route as we strongly believe that the future of all Instructor training including motorcycle should lie with vocational training and the associated quality assurance provided by a nationally recognised awarding organisation utilising properly trained External Verifiers. Improving instructor qualifications for car and motorcycles is only tinkering around the edge of the problem. A completely new start is called for and vocational qualifications can provide this

Any ADI can train another and may have poor understanding of transference of skills

The ADI route has been here a long time, any changes to it will bring about a lot of resentment from older ADI'S, if they have to be re-tested to come up to new standards, it's about time we had clear-out of poor driving instruction

It's extremely important the DSA retains control of the qualifying process through testing at key points in the qualification route. Any added cost should be placed on the PDI - this will force PDI's to carefully consider at each stage whether they should continue. A combination of the vocational system with key stage testing by the DSA would be the best option, but isn't offered.

this option is not perfect but it would still give our industry the protection of a governing body and allow for some modernisation and hopefully provide a starting point that can be used to allow for the updating of current adi's as well as new people joining our profession

We need to remove the slap dash approach some instructor trainers have. I believe a formal qualification with documented progress and standards would do this.

Trainee licence is a good idea but must be declared when teaching

The Grading Structure is a bit cloudy. Most ADIs are Grade 4. Why not just have one grade for all ADIs who are qualified. Grade 5 or 6 doesn't mean you can earn more money as peoples choice in this current economic climate is more driven by price.

This route no longer addresses the needs of a new driving instructor. It is limited to technical ability with no emphasis on the real life issues faced by every self-employed person. Anyone dropping out of the exam process at any stage does so without any transferable qualification.

Using real pupils will show exactly how well a lesson can be delivered, or what needs to be improved.

As I didn't go down that path,until I was fully qualified to teach

This is a better idea, raise the standard of the part 1 ,instead of multiple choice questions, ask the PDIs to write down answers to questions.Some of your ADIs now can't even speak English.

this is more cost effective, practical and logical option as this is developing on the current qualification system,

Some companies seem to abuse the pink system. Also the public seem to be completely unaware of the pink licence.

The existing system is excellent it is just the way in which various organisations implement it.

We should have a professional qualification, driving instruction is viewed to be at the low skills end of the 'professional view' of jobs at present. Driving is a life skill and all drivers need to recognise this driving is not a right!

Its amazing that after all the so called consultations ...change is happening again..who has wasted time and money on previous 'improvements'

Having used the Trainee Licence process myself, in my experience it does not enable you to successfully pass part 3. If it did why do so many trainee PDI's fail part 3? Equally I think driving schools use it simply as a means of selling expensive PDI franchises. The one I operated was £100 per week more expensive than a PDI franchise. This forces you to focus on making a living rather than training up to the required standard?

PDI licence abolished!! I hear too many PDI's asking how this or that should be done in a lesson (or how they've dealt with this or that situation on a lesson) whilst waiting at a test centre. It worries me! Qualified instructors only!!

better than nothing.

Hard to agree when this question is so open as you could take from my answer any number of opinions. It needs improvement but then what's improving with training the trainers who then train PDIs? Surely this is starting at the wrong end of the process???

The current method has worked for some 20 years, do we need to change it really or just improve it?

I like the idea of prior acquired learning being used to gain the qualification, via the NVQ type route.

the proposals would be in my view unworkable and extremely costly both for the PDI and the ADI.

To modify the existing route would be missing an opportunity to reform the whole process and promote the professionalism of the profession

I can see no useful way of improving the current system, as it is built entirely around instructors proposing to teach novices

in my opinion some examiners roll play is not anywhere near how the learner driver behaves and their(examiners) assessment of the test is not satisfactory at all.

Yes keep it simple. Driver training is a course of instruction which is now becoming so complicated, when the needs to instruct a person to drive are very straight forward. When will people who do not hold the ADI qualification or Trainee Licence, be taken out of the driver training field.

What we need to do is retest existing drivers every 5 years.□It is there bad driving that is a bat influence on new drivers

This is the next best option in my opinion.

Trainee licence scheme needs improved as it has been abused for many years by driving school franchisers.□The current qualification route in my opinion does not prepare PDIs for life as a ADI

I don't know what the answer is for trainee licences. For me it was valuable. I don't think i would of liked a adi with me, besides how does the monitories work? Does the pupil pay the trainee, then does the trainee pay the instructor ?If so trainee is left with no money. Qualifying was very expensive, I cant see how having an adi in the car with you would work. I suggest maybe increasing the trainee licence period to 9 months as 6 months flew past. Also there want always a part three exam date available.If your worried about the cost of extending a trainee licence, increase the time limit to 9 months.

How would you become an organisation which can verify?

If the process is to change then there should be more emphases on how to teach effectively not

just learning psts !!

Regional training centres and courses should be implemented to standardise expertise.

I believe the ADI accompanying the trainee on any lessons should be the training ADI to maintain consistency.

The vocational qualification is the better option, but what is currently proposed is so deeply flawed that I can't support it. The only thing I really dislike in this proposal is the use of learners in the part 3 test. Learners are not guinea pigs and if DSA examiners cannot simulate a learner then I don't see how they can assess the exam. Using learners is less safe, opens the way for cheating and the examiner in the back cannot observe all they may wish to. Also who provides the learners? - They are a valuable commodity to be treated with the utmost respect.

If an ADI has been properly trained by a recognised trainer i think that is enough however there should be more transparency regarding the publics understanding of pink licence holders. I think if the public were made more aware then no one would employ a pink licence holder.

This I agree with.

The industry needs refreshing.

So long as ADI's emerge from the scheme as competent individuals and are suitably experienced to do the job.

Option 1 is a much better proposal.

Introducing a commentary drive into the Part 2 exam is an excellent idea as I have found it to be an invaluable tool in learner lessons on forward planning and hazard awareness. □ Changing from role play in Part 3 can only be a good thing as it makes the exam more like a real life lesson.

Why change something if its not broken

A teacher in school has to train for 3 years FULL TIME with the assistance of fully qualified teachers. A pdi can qualify after 60 hours approx. and then give Instruction to learners how not to kill themselves or some one else when they are in charge of a lethal weapon. A sensible MINIMUM amount of hours for pdis and for learners should be introduced. eg for learners 120 hours as an example. Not one year. A learner could do 20 hours in one year, its not enough. Fast pass " learn in a week " courses MUST BE BANNED IMMEDIATELY.

The DSA know that they can do as they please. The qualification has been tinkered with and the comments are always the same, to "improve driver training",

THE SYSTEM WORKS - DON'T CHANGE BUT AMEND POST QUALIFICATION PROCESS - COMPULSORY CPD

The whole system needs to be revamped and made into a respectable qualification.

We feel the best option is to require all potential driving instructors to gain a vocational qualification that encompasses the theoretical elements of the suite of DSA Standards Documents (facilitating learning, Goals for Driver Education, knowledge and understanding of the Highway Code etc) before taking mandatory, in-car supervised training with an ADI linked to a training log book. Once this was completed they should have to pass a DSA assessment of driving ability and a DSA assessment of instructional ability based on the new Standards Check.

We should only have trained staff offering suitable training and having a supervisor monitoring the trainee as they give lessons will improve the learning for both staff and pupil

Reforming the trainee licence to insist that an ADI is present during lessons will be very difficult to police. Who will get paid for the time spent teaching? Whose car will be used. No one wants to work for nothing. Pupils are thin on the ground now anyway, so all money is needed. Someone will be missing out financially.

As someone who qualified via the trainee licence process, it was clear to me that my time as a trainee gave me little educational benefit, and maximised the opportunity of my training organisation to take the maximum of revenue from me, whilst giving the minimum in return. I was only able to qualify (part 3), by paying for additional ADI lessons, over and above my programmed hours. Trainees should work fully supervised in the same way as apprentices do.

May reduce the overall fiscal and personal costs.

The present system is ok but needs improvement and modification.

If a vocational qualification does not come about this option is the second best option. I like that fact the qualifying teaching exam would be a whole driving lesson - far more realistic than the current part 3 test. In reality I don't really feel a continued need for the trainee licence any more - the trainee licence has been enormously abused over the years

Depends on a lot of factors

will the DSA enforce it if so how ?

how will you be able to enforce it should a badge not be shown?.

badges at present are not shown by many instructors and there is little enforcement of this requirement. there are not enough enforcers of the legislation.

Thank goodness perhaps this will end trainee licence holders teaching pupils but charging the same hourly rates as those with green badges

This could be done in the short term ahead of the introduction of the VQ, and should the VQ be delayed or shelved for political reasons there would still be reform in place

Any changes are going to help the industry. However, this route is still open to abuse.

Although I have always worked for myself - there are certain individuals and company's who exploit trainee license - I feel 3 month limit is long enough. Then a month extension between further tests if needed.

Either leave it as it is or give it a full overhaul.

This is the right option.

The existing arrangements are a little dated and open to abuse by some trainers/organisations

I feel the pt 2 driving test should reflect a more advanced nature, i.e to include the delivery of a 10 - 15 min structured and informative commentary aspect. Also reduce the amount of maneuver's to only two in order to extend the driving element.

Change is good! Lets give the industry a boost by encouraging fresh ideas all through.

Definitely agree for the reform of trainee licence scheme. Even though I went down the route of a PDI Licence, at the time with BSM a very reputable company. I felt i was very alone, no supervision what so ever, was told to read the Driving Essential Skills and continue to teach. I should have never been left alone knowing I wasn't fully prepared.

potential adi's need to be chosen and go through some sort of selection process. I am constantly amazed to see the shabby instructors and cars presenting from test. They or untidy, grubby and often do not even appear clean.

I personally believe there are wider issues that need to be examined regarding this process but, once again I am not certain that the DSA know what they are!!

I personally feel that 'ORDIT' is a joke and that is why I slightly agree with the proposal, with more clarity please.

Scrap this scheme, it is universally understood to be no good.

Who is going to pay for the second person (ie the ADI) in the car. This would significantly INCREASE the costs to any trainee. □ In addition, if you were the pupil, you would want the supervising person to teach you and NOT the trainee

not certain of the value of the tranee licence scheme in any form

Again there are too many unanswered questions to form a very strong opinion either way.

A very robust approach to training (such as the National Standards) needs developing for both classroom and vehicle training. Removal of PINK licence should stop abuses. Constant supervision of PDI whilst teaching, by sponsoring ADI, could accommodate this and produce a better educated prospective instructor, against leaving someone to their own devices after the basic hours are completed. This would possibly avoid a compromise to road safety.

I don't think the current scheme is as broken as you make out it to be. If you made ORDIT compulsory and for ORDIT to hold more weight and have a greater control and influence on the quality of ORDIT trainers, this would solve many of the issues you have focused on in the consultation paper. Also if you kept the trainee licence option but removed the 20 hours option but kept the 20% supervision or increase it to 50% this would also increase quality and standards of PDI training. According to your Consultation Paper you imply that any ADI can sit in the back of the car with a PDI giving a lesson to a learner. How does this improve the standard and quality of tuition if the ADI has no requirement to be checked by an accredited organisation? I think you are really complicating an existing system that has many good points and very few flaws.

A very robust approach to training (such as the National Standards) needs developing for both classroom and vehicle training. Removal of PINK licence should stop abuses. Constant supervision of PDI whilst teaching, by sponsoring ADI, could accommodate this and produce a better educated prospective instructor, against leaving someone to their own devices after the basic hours are completed. This would possibly avoid a compromise to road safety.

I think the training route is fine has it is, but individuals should only be allowed one trainee license each

Proposal does not go far enough. Part 1 can be improved by using some questions that require written answers. □ Part 2 the number of manoeuvres should not be reduced, if you want more time for driving, then extend the test. □ Part 3, I agree with no preset tests, but using a real pupil means that tests will not be equal, some real pupils will perform better than others, some will display nerves, and there is also the possibility of things being 'set up' in advance.

Greater pre-training screening and better communication surrounding everything that is involved in the qualifying process is a must. As an existing ORDIT registered trainer I have seen many people spend money on training, having very little knowledge of what is required beforehand. This is partly to blame, in my opinion, with the moral ethics of the training providers taking their money.

Unite agree with this proposal, we have been calling for it for a number of years and a small improvement rather than large-scale changes is what is required.

A PDI should not be left to their own devices learning as they go along which I had to do. They should be supervised by a sponsoring ADI and should be treated as an apprenticeship.

A national standard requires developing for both classroom and in vehicle training. The removal of the Pink Trainee licence would go a long way to remove abuses of the system. constant supervision of the trainee would definitely improve road safety.

The existing regime should be modernised in a way that overcomes the weaknesses and builds on the strengths. The trainee licence should be abolished. The current theory test should be replaced with a vocational qualification, linked to the standard covering and assessing all the knowledge and understanding as set out within it and a pre-requisite to taking the practical elements. The on-road assessment of driving ability and the test of instructional ability should be modernised and carried out and quality assured in-car by independent driver training experts from the new agency or the driver training industry. This will strengthen the link with the new Standards Check and maintain the link to the statutory driving test.

The trainee licence has been abused for years, with the largest stakeholders having a blind eye turned to multiple pink badges and exceeding the one to one ratio. DSA supervision of the current system is not fit for purpose.

ADI part one must be greatly improved to test a candidate's knowledge of the national standards along with the present syllabus. Multiple choice questions are of very limited use in testing a candidate's understanding, and would suggest essay, short answer questions or interview questions. Although this would cost more, this would improve the quality of driver trainers and therefore the driving public as a whole, helping to reduce KSI statistics (which in themselves cost the country so much more year on year, than extra investment in the

independent assessment of the driver training qualification process would incur). □ I completely agree with your suggestions to improve the ADI part two test. □ ADI part three can be further improved/extended in line with the national standards as you suggest, again with further costs but would produce highly qualified, knowledgeable, professional ADIs. This along with reform of the abuse of the trainee licence scheme would be greatly received.

Not everyone is lucky enough to use a trainee licence I believe it should be mandatory.

A very robust approach to training (such as the National Standards) needs developing for both classroom and vehicle training. Removal of PINK licence should stop abuses. Constant supervision of PDI whilst teaching, by sponsoring ADI, could accommodate this and produce a better educated prospective instructor, against leaving someone to their own devices after the basic hours are completed. This would possibly avoid a compromise to road safety.

The PDI scheme is failing both the instructor and trainee. The scheme should end and paid instruction should only be offered by an ADI. If a candidate wants to gain experience this could be done under a revised scheme where he/she is accompanied by a registered trainer, the pupil or student in the driving seat is fully aware and no money changes hands. However my fear is still that this undermines financially those fully qualified ADI's

Agree with commentary driving on Pt 2 tests. Also a genuine lesson although more difficult to arrange than the current role play option, would probably give a truer reflection of the candidates ability

We have already commented at length in our answer to Q7 on the proposal to only allow teaching for reward if an ADI is present in the car. Option 2 also incorporates some unspecified improvements to PART 2 and 3 in order to better comply with the National Standard. Within reason, we welcome the alignment of the training and testing with the National Standards. We note that for example needing to give a commentary during the PART 2 test is another barrier to passing and conclude that the pass rate is likely to fall.

The DSA asks for comment on the accuracy and assumptions used for the implied costs of option 2. The assumptions are buried in a number of referenced documents and difficult to follow but it does seem that these costs have been greatly overestimated. □ The document states that this option would have the benefit of not requiring any change to the ADI training industry. This is not necessarily a good thing. While the option 1 route would be costly and leave ADI training in the hands of a few large organisations and require the closure of the ORDIT, allowing the option for anyone to offer ADI training without any form of registration or training is a serious issue that needs to be addressed. □ The DSA should investigate a change in regulations to require ADI's to obtain a qualification, possibly through Ofqual, before being permitted to join ORDIT. This would have two benefits; sub-standard ADI training would cease and costs to the DSA for ORDIT inspections would be reduced. □ The document implies that this option would only achieve a partial alignment to the national standards, however this is not true.

The DSA is as capable as Ofqual to devise the assessment so that the requirements of the EU directives are met. Implementing option 2 will cause an increase in costs to the trainee, but only minimal increases to the DSA. It is the only option that preserves the high standard of training and driving in the UK.

for years i have said NO pdi driving lessons for years you have allowed the public to be short changed! you should be ashamed.

driver training also needs to be improved

The Pink licence should only be issued when the trainee is to be supervised 100% of the time when teaching for money. Anyone wishing to become an ADI should have to take an adult teacher training course before they can apply to go onto the register - these are readily available at local colleges and would prevent mass marketing to the unsuitable by way of television advertising and other marketing means

Trainees under supervision

The trainee licence has been abused by the big players.

Get rid of pre ste tests but still get the examiner to role play making it up as he goes along. This would be like a real lesson we have to take when a pupil does unexpected things we have to identify and correct etc. Would cancel out the risk of preparting a pupil.

It really helped me being on a trainee pink. With no super visor

Better than nothing, though Option 1 is preferable.

The ADI is difficult to do and if it was conducted within a classroom it is no substitute for live on road experience

Allow LGV Instructors to match over parts already passed in their qualifications

I repeat my respose from above, I have said this should have been done for the last 25+ years. I was given the impression this was to happen when the DSA was born/created and nothing happened. The current system is not, and has not been fit for purpose since before the DSA arrived on the scene. Considering it employed CEOs from outside the industry with no knowledge of what was required we had no improvemnet or development in this area. Now a vaguely thought out idea is being rushed through consultation process.

However a less complicated route, but not and thorough.

ORDIT has never been compulsory and has never been able to operate within those perimeters,

I consider that there is need to improve the qualification route for the would be ADI. The system we have has been virtually the same since the introduction of the Register, apart from the Hazard Perception. I do believe the Theory Test should have an element of a written response, compared to all multiple choice as it is at present. I understand that it provides problems with the marking of such responses. However, it does provide some evidence that an individual can write to some degree.

There is nothing wrong with the current system.

As DSA have a wealth of knowledge and expertise in this field so it seems strange to throw the baby out with the bath water. the Part 2 appears to have been watered down over the years and the Part 3 unrealistic and irrelevant particularly in regard to the examiners hands being tied where they can only test within a given area. Although consistency will always dictate that parameters are needed, the Part 3 could be easily adapted to take CCL into account and be set up as one phase with the examiner setting a broad subject such as 'Junctions' at any level from part trained to trained.

This could be done in the short term ahead of the introduction of the VQ, and should the VQ be delayed or shelved for political reasons there would still be reform in place

The PINK should go, taking the abuses with it.

A strong approach to training needs to be developed, constant supervising by sponsoring ☐ADIs could be the vehicle for this. At present individuals are left to their own devices following completion of their basic hours. Better education of prospective instructors would ensue.

Providing an environment in which a PDI can learn the profession, similar to an apprenticeship is needed. The importance of communicating that to the public cannot be underestimated.

I think the system now works very well, including the T/L scheme - it just needs managing better by the DSA to stop people abusing the system

Too many instructor training programmes exist where they try to get PDI's out on the road. I believe this is to save those companies money as they feel they don't need to offer so much training, plus they have more of their branded vehicles on the road. I believe this has a severe

negative impact on our industry.

There are, I suspect, many poorly trained trainees released on the paying public by establishments whose only concern is to make their business profitable.

Option 1 is far more preferable

the current system does not ensure a good standard of instructor for the customer. it is left to individual trainers to fill in the gaps that PSTs don't fill.

Our strong preference is for Option 1 although if Option 2 is the only option available we believe it is a better option to the current qualification.

The trainee licence is really a waste of time as PDI's would generally switch off until the 5 month point and then come and ask for some tuition. As a former instructor trainer with a national driving school I saw this first hand. If they had an ADI with them on every lesson then they will benefit and end up as much better instructors and stand a greater chance of passing part 3

It would be a great shame to miss an opportunity to make a significant change. The problems within the current system would largely still be present. ☐ I appreciate that this would have a less dramatic effect on sole traders, but I do feel that the industry needs to move forward and this option does not provide that opportunity.

it appears the some use the trainee license route to get more paying PDI's into a franchise rather than improve their training.

Make the test true to real life teaching. Make ORDIT mandatory for ADI training. Better 'policing' of the TL scheme.

I'm torn on this one I feel we could belittle the industry by letting live pupils be part of a test!

I have been astounded by the standards of newly qualified instructors that havent received proper training, facebook (i'm a driving instructor) section is public proof.

Trainees need monitoring, not necessarily every lesson but I believe too many are left to do their own thing

will need to be regulated to stop the big companies using and abusing this system

The trainee licence has been abused for far to long by sections of this industry who are concerned more with making money then producing good quality instructors. I won't dwell on this as I'm sure you understand exactly where I'm coming from!

The proposed changes demonstrate the immediate improvements to the system which are required and will improve the current system

I think that the qualifying process should be revised in order to increase overall standards.

As in our answer to question 7, we are strongly in favour of external assessment and certification for the driving and instructional ability parts of the qualification process. We support the proposed changes to the Part 2 examination process as detailed in paragraphs 82 and 83 of the consultation document. However, we do have significant concerns about the proposals for the changes to the Part 3 test.

costs

We **STRONGLY AGREE** that this option should also be considered if the vocational route is not implemented. The current system does not have the provision or scope to produce thoroughly prepared ADIs and as noted above has a high drop-out rate. The current trainee licence system is not policed sufficiently and is easily open to abuse. Reformation of this scheme must include supervised training delivery.

We do not agree with any option which simply aims to tinker with existing qualification routes which we already acknowledge as an industry are not fit for purpose, and are not future proof. Wholesale change is necessary to progress the profession of driver training.

We **agree** with this option.

Agree. A very robust approach to training (such as the National Standards) needs developing for both classroom and vehicle training. Removal of PINK licence should stop abuses. Constant supervision of PDI whilst teaching, by sponsoring ADI, could accommodate this and produce a better educated prospective instructor, against leaving someone to their own devices after the basic hours are completed. This would possibly avoid a compromise to road safety. There has also been a chronic over-reliance by the DSA that normal educational principles can be transferred into a classroom which moves at 45 feet/second driven by a nervous pupil who is fully aware that a serious mistake could have drastic consequences. It is naive in the extreme to think that teaching in a moving vehicle is anything like a classroom. This is the kind of mistake that only people with no experience of teaching in a moving car would make. It has to stop. Now.

Our strong preference is for Option 1 although if Option 2 is the only option available we believe it is a better option to the current qualification.

Feedback on question 11

It is proposed - Option 3 in the Consultation Paper - that we make no changes other than to reform the trainee licence scheme. How strongly do you agree or disagree with this proposal?

It's time for change as mentioned in 9 above

If it isn't broke, don't fix it.

There is definitely changes required

The trainee licence, if used correctly, can be a useful tool to becoming a professional instructor

Driving is a very important skill to acquire for the sake of road safety. Driving Instructorss should be suitably qualified.

The trainee system definitely needs improving. The ADI system could easily benefit from some changes but these do not need to be sweeping one.

The system works well at this time. The only people who want to change this system are the training establishments who see increased revenue.

Keep it all in house . The DSA have hundreds of very experienced examiners. (pity they disabuse them) The trainee licence system has brought driving tuition a bad name, caused a cut price war , and put many very good learner driver instructors out of business.

Trainee Licence is too open to abuse.

This would equal no change.

any additional training to the trainee should be practical in instructing and coaching.

I think the trainee license is a good way to get a good idea of the way adi's really work but think that it should be done under certain conditions ie with I fully qualified adi

Why only do HALF a job, reform is needed across the board.

ADI's should be properly trained in all aspects of driver industry including how to understand the needs of the pupil .

scrap trainee scheme

The system needs updating to meet the needs of the modern instructor.

Trainee licence scheme reform using ADIs to supervise lessons is a flawed idea. I understand that there may be no Part 1,2,3 test data evidence to prove that ORDIT registered instructors get better results, but that does not mean the ORDIT register is nulled and that the trainers who have undergone this assessment do not get better results - it just means the data is not there. Some work should have been carried out to investigate the quality of the training given by ORDIT registered trainers vs 'any ADI' and this would have established that in contrary to the test data evidence, ORDIT trainers and instructor training is a highly skilled role that requires a further developed set of knowledge, skills, attitudes and behaviours. If your research did not establish evidence of this then the research was/is flawed. I am firmly of the opinion (via experience) that a regular ADI will not be able to offer quality instructor training but in fact will compound and reinforce poor instructional practice and techniques and therefore by allowing any ADI to supervise Trainee Licence lesson delivery is a route to allowing instructional standards to fall.

More time with their trainer and more of the trainer supervising them with pupils instead of just being let loose with people and off you go.

The trainee licence scheme has helped a lot of people become a good high standard of instructor.

Yes I don't agree with all the changes being proposed. like making a fleet check test different. the one in place at the moment serves well

Reform the PDI Licence, but still with ADI's monitoring their progress and a minimum of additional hours to be attained within the 6 month period.

Qualification and trainee route both need to be looked at.

The PST approach to Pt 3 needs rethinking

We need change and the change we need is to keep the existing system but update it as per

option 2 and keep it in full control of the DSA.

The part 1 exam should not have all the questions made available to ensure correct study takes place rather than simply answering questions previously learnt from a data base. I qualified 16 years ago and there was not a data base available and I feel that I learnt more from studying books and other forms of research. Talking to mentors and verbal explanations. Also Commentary driving should be introduced into the Part 2 rather than hazard perception test to assess a candidate's ability to assess risks on the road. And improvements made to part 3 as answered in the previous question.

As an industry, we have been talking for years about how bad the qualifying process is and how unsuitable the tests are. Change is well overdue.

Do away with it

Same as above in that my concerns largely relate to the trainee licence and exploitation of prospective PDI's by training institutions. If it is felt that no changes to qualification are required then this is necessary. To reiterate, too many PDI's have long taken advantage of the trainee scheme and pupils pay full price for lessons taught by a PDI who just doesn't have the experience. In addition PDI's don't tell pupils they are not fully qualified which is extremely deceptive. It is not fair on the pupil and not right.

This priority change should be introduced first. The VQ can wait. Many aspects of this proposal are unclear. In the event of an accident during a supervised lesson where does the responsibility lie? ADI, PDI, or learner. What insurances would the PDI be required to have? If the ADI's vehicle is being used could the ADI claim against the PDI in the event of an accident? Would a third control "triple controls" be needed so the supervising ADI could stop the car if both the learner and the PDI (with the dual control) failed to take action. Do the mechanics for triple controls exist? These questions and many more are not addressed in the proposals.

I feel it is somewhat unlikely that many PDI's will undertake paid instruction because of the cost of employing an ADI on lessons. I therefore feel the DSA might just as well eliminate the PDI phase altogether

I have seen some very poor tuition being performed by trainee instructors, and feel that the pupils lack of information on the use of trainee instructors means they are not always getting value for money.

I strongly agree. The NVQ route hasn't been thought out at all well. What happens when a holder of an NVQ fails a Standards Check? The DSA have not given the industry an answer to this question and until they do how can anyone be expected to agree or disagree until they are

in possession of all the relevant information.

The qualification system definitely needs to change to meet modern day requirements for safe driving.

I believe it is necessary to ensure that PDIs are trained to teach learner drivers to drive and this will also enable their attitude towards the pupil to be assessed.

as above

The current trainee license is a bit of a joke. there should be greater supervision of trainees

I think changes are needed - perhaps more along the lines of an ADI's pupil test results over a period of time rather than in a single part 3 or check test. The results would need to look at the level of faults not just pass or fail.

The training companies need to be monitored more closely by the DSA to ensure they are giving the required training, as there is a great variation.

This would be viewed as a "cop out" as no real change would have been implemented.

Trainee licence is a useful route into full licence!

The trainee licence needs to be controlled and overseen by the DSA. Doing away with it would be to relinquish responsibility for the standards that should be adhered to. To ignore the abuse by some training organisations is wrong and needs to be addressed, not pushed out of sight.

I have trained hundreds of ADI's, some would have not made it without the trainee licence and have gone on to become excellent instructors, some have qualified without a trainee licence and are poor instructors, yes the licence can be abused by big schools using it as an earning tool but the option of the trainer sitting in for 20% is unworkable, go back to the SE arriving at some unknown point in the PDI's day and sitting in, that would show the day in day out workings of the PDI and is far less able to be set up.

A pink badge is a good way of learning if supported by a ADI with high standards

With the current system the candidate can be taught to pass a test rather than taught to be an ADI. With a less rigid system this would be more difficult and there would be more emphasis on the Core Competencies in general rather than just the PSTs

I strongly feel that the 3 qualification tests and trainee licence system should be left as they are, unchanged

some trainees know nothing

There is a need to improve the quality of instruction given by some members of the ADI profession to raise the standard of all ADI's to Grade 5 and above

All PDIs should have experience of teaching Learner Drivers (and Trainers in role play)

The trainee licence scheme is wide open to abuse and is in greater need of immediate remedial attention. Rather than just change the outgoing check test why not have some statistical analysis in respect of pass rates. ADI's maintaining pass rates above say 50% are surely not in need of inspection, whereas those with lower or much lower pass rates clearly are.

As per comments above in (9)

I think that the current system needs updating but how I am not sure.

this should change and be made tougher, only 3 months training on pink.

This seems the best option by a mile.

Unless the option to tighten the standards required to pass parts 2 and 3

as above. Changes cost money...meetings...expenses etc. Only the people in high positions with little or no experience teaching stand to gain

Changes are need to come in to the 21st era and beyond

The PST tests are not fit for purpose.

A reform of the trainee licence scheme is long overdue and needs to be taken out of the system so that trainees get the correct training before attempting part 3

change and evolve or die

The system needs a shake up, the dsa needs to engage a little more with the trainers, I see a

lot of misunderstanding by instructors about the true roll of the dsa. This filters through to pupils who see it as "them and us". We are all on the same side really.

Option 1 is better in my opinion.

Whilst I feel that a trainee licence can be valuable, I also feel that there are some driving schools who abuse the system, so maybe restrict the number of lessons that a trainee can give?

Refer to previous answer regarding closing the register. But at the moment a PDI can spend the time on the trainee licence without ever actually having an ADI observe a lesson being given. A potential ADI can also take the part3 exam without having taken a trainee licence and is then free to teach and call themselves a fully qualified ADI.

Change is required to move forward.

See above. and I believe there could be a safe to teach test on a trainee license.

Time for change in the ADI qualifying process is long overdue.

As a former PDI I found it invaluable in learning the "business" side of being an instructor. This must not be lost.

This is a waste of time, the standards of driving throughout the country are falling.

the whole system needs re-defining. The old system was designed years ago and needs a complete overhaul (and this should also include compulsory training for LGV / HGV instructors too - after all shouldn't they be capable of delivering an even higher standard of instruction.

SEE ABOVE

something needs to happen as I agree that the current "check test" is not a true reflection and that the PDI's need to be controlled or the scheme scrapped

I think the teaching ability test needs to be made more realistic so it does need changing

No changes means we still land up with licence acquisition and not people learning to drive

I don't think tinkering with the system is enough.

We should completely change the part 3 exam, it isn't fit for purpose any more. A more sensible and fair exam would be a 1 hour lesson on a general topic i.e. Junctions (all types to include roundabouts), each manouvere, control and moving off and stopping etc.

There needs to be an industry standard in instructor training which does not exist currently. A standard for instructor training has to be put in place and whether this is a licence to train ADI - much like ORDIT qualification or a ' new' qualification the DSA/government should work towards that.

As the industry is about "Teaching" and "Educating" people to drive, naturally greater emphasis should be put on the overall knowledge of an instructor and the educating of the instructor to educate.

We have to improve

The Part 3 test is unrealistic, and improvement could be made, however, the sweeping proposals mentioned here simply seem an avenue for the government to avoid investing in the existing network of driving examiners.

If we do not make changes, then this exercise will have been a big waste of money

The profession needs a shake up. Traffic is busier, vehicles are more technological, there are more distractions from phones, social media, drugs, etc. We need to be ahead of the game. We need our processes to be improved, higher standards, etc. We are not viewed as professionals by the public in general, and we will not be until the profession is modernised.

This to me is the best option. If it ain't broke don't fix it. However I do feel that for the benefit of the paying Public the training licence should be reviewed. Only fully qualified ADI;s to give payed instruction.

Only minor improvements are needed to existing system.

Its my second option. It will keep me in the business

The training needs to be updated, but my comments re trainee licences see above.

something to be done here-

It seems that DSA is thinking about making changes that are in my opinion unnecessary. Why fix something that is not broken?

This is an opportunity to review the bigger picture

I don't think this will do enough to bring about the necessary change / improvements to the driving instruction profession.

The current route clearly isn't working and an overhaul is required.

The check test needs updating - the result is down to if you are a good 'actor' and can carry it off, unlike a 'real' lesson.

Training needs to be improved to improve standards

The training on offer needs to be improved (based on my experience, admittedly several years ago).

I know that if I had not been able to go onto a Trainee Licence and gained the invaluable experience then I do not think I would have further my career in this industry.

Used correctly the trainee scheme is a great way for a PDI that is struggling to actually put their training into practice aiding in their qualification

The system need updating

There needs to be a change in the current PST based structure to the test. These exercises do not really map well student lesson structures.

Improve it, man up, set some standards

dont really agree with trainee licenses. I am a recently qualified adi and i didnt use one. Dont think you should be giving instruction until you have met the required standard and be fully qualified.

The vocational qualification is a good introduction and understanding of what will be needed to

be an ADI

Best option by far but asking an ADI to sit in the back of a car while a wet behind the ears PDI has sole access to the dual controls and a nervous learner is actually driving the car just will not happen.

trainee license is open to abuse I know of trainees staying on license for 2 years this should not be allowed 6 months should be ample to take part three 3 times

why change what is not broken?

No... everything can be improved

Again no strong opinion, it seems we live in an age of constant reform for no particular reason.

Trainee licence scheme has been abused for years

The trainee system certainly needs to be changed, however once again it was poorly administered when I did train instructors, allowing ADI's to sponsor numerous PDI's and PDI's to extend their licences due to test waiting times etc.

It is clear that learners were not informed of the training status of their PDI teacher and that little was done to support the PDI in many instances.

It not fare for trainee to be charging the same price as a full licence older that need to be change

Comments regarding the Trainee licence above apply equally.

The current sytem is working reasonably well, you just need to fix the bits that are need reform. Then concentrate on the major problem post test attitudes of youg drivers.

The time it takes is to short , more training is needed (professionalism) needs to be put back.

Reform? The basic for driving changed ?still steering wheel and pedels are you trying to reinvent the wheel

stop meddling

It is in every persons interest to look to improve the way pupils gain experience on todays roads. Improving driver training is a big part. however I think that people need to be made aware of things a lot earlier in their lives and a more vital thing that should be looked at is perhaps introducing some learning programme into the National curriculum.

There needs to be a change to a more realistic environment such as using a real pupil rather than role play

There is a need to freshen up the current process if jonly to reinforce standards of training

I do think the qualification process needs to be updated.

Modernisation is required through out the training in my opinion.

My remarks above stand,and I would be against scapping the the trainee licence.

its ok if your an ADI but what about the exsisting lgv/pcv DSA REGISTERED INSTRUCTORS?

The trainee licence scheme is rather weak at the moment, just because someone has a trainee licence doesn't mean its beneficial to them, if the training they are receiving is poor then they are just giving poor instruction to the learner driver. Why not have a trainee licence where the PDI has to be supervised on every lesson by a qualified ADI

Change is needed, personally I would scrap the trainee licence altogether. I never had to use it and I know many others who didn't.

The Industry has to appreciate that there is more money to be made training the Instructors than there is being an Instructor and during training, never is there any mention of real Pupils, its all about passing the part 3. The trainee licence is just a smoke screen to convince prospective Instructors it's the way forward.

Not forgetting that it saturates the market and makes qualified Instructors the ones who the money grabbers, as the Pupils last Instructor, hadn't taught them correctly.

I would also like to see an end to 'Learn to drive in a week' courses. This is irresponsible; its like Happy hours in pubs. There to generate money, regardless of the implications.

This addresses one issue in the current scheme, but makes no progress towards a 'standards-based' solution.

I do however believe that some trainee licence holders are just given a pink badge and told to

get on with it by their franchisor. There is very little support from their training school. Option 2 is a better solution, but the reality is they would not gain that much experience and therefore not be financially viable for the trainee to apply for a trainee licence. Going with the option would stop schools taking on pink badge holders and serving them as if they were an ADI and without much support.

Radically change it

I think an overhaul of the whole organization is needed

Trainees must be accompanied by an ADi. But at what cost to learner driver?

The current Trainee Licence scheme is open to abuse. Any new system should be open to external verification and be able to demonstrate that the Trainee has received the correct practical training as a part of the qualification process.

I believe that there are both positive and negative aspects to both options 2 and 3 - it will depend on the implementation strategy that the DSA chooses to follow. I feel that further consultation is required following the findings of this consultation - it would be useful to provide a further suite of more-specific 'fine detail' options and canvas opinion on those.

Nothing wrong with trainee licence if the system was more closely monitored

Even if you only reform the trainee licence scheme this would be a step in the right direction.

As i said keep things simple

Option 1 is our preferred option. This option does not impact on the instructor training elements or the DSA tests at all as it focuses on reforms to the trainee licence scheme.

I feel that the relationship between instructor and DSA needs to be improved to helping and informing, rather than with a lot of examiners it is a them and us mentality

I feel, as has been proposed, that the use of a trainee licence should be just that, and not a way of earning a wage. Therefore, accompanying a trainee should be an ADI.

There needs to be a radical transformation of ORDIT as we discussed at Cardington several years ago. For those professional ORDIT trainers who are passionate about producing top quality ADI's we felt the DSA needed to step in and promote ORDIT as THE professional body it

needs to be.

Check tests do need to be changed.

If this option means that no extra expense is likely then in present climate this should be considered. The cost of any changes should not come from the licence holders and no more burden on the tax payer.

It is the best option.

How can the PDI earn if he is paying a ADI to sit on lesson?

Updating the theory part to link with modern technology can easily be done. Ensuring that trainee instructors book a test within the first two months of the licence will ensure they will try to pass, non compliance should invalidate the licence. Some trainees are natural teachers and give far better instruction than some experienced ADIs. I was infact a PDI some 20 years ago and had one of the best pass rates in the BSM office of over 40 instructors.

Please note our comments above. We are particularly keen that this option is not adopted for either motorcycles or cars as it has no benefits for either mode

The current training is totally unrealistic and very negative being based purely on fault finding it does not encourage an individualistic approach and can be passed by merely learning a set of briefings

From my experience of check tests and instructors in general, is that they retain a standard to "pass" a check test and then for whatever time revert to their standards of poor training, I believe the examiner should set the lesson for the pupil to do depending on the information the instructor gives them in relation to their abilities, wether they set a new lesson or a previous lesson , just like the Pt3 test, this would stop the instructor and pupil setting up a lesson for the day, change is desperately neede in the whole of the accreditation system.

If, after the consultation, it is deemed that PDI's must have vocational qualifications then I think this should be rolled out to existing ADI's as well

The need for change is obvious but we don't believe there is an optimum solution in this proposal.

the trainee licence scheme is well overdue for reform but it is only a small but significant part of the process that needs to be sorted and on its own will not deliver the changes all responsible

adi's would wish for

The system does not work as inadequate ADI are being produced who have neither the experience or education to teach/coach. This cannot be taught by trainers who are on a tight schedule to get you through in as few lessons as possible, thus keeping their profits high.

Trainee licence holder should be accompanied by a qualified ADI to teach and charge less than fully qualified ADIs.

The trainee licence scheme is not the problem. The regulation of these is. If regulated and monitored correctly they are a valuable source of experience.

this is also a good option.

There is always room for improvement.

CPD needs to be compulsory, but with relevant courses for all trainees and ADI's. Not courses like on just the psychology of driving.

We need reforms in all aspects of driver training and licensing, why not have many car tests as you have introduced for motorcycles...or as an outrageous suggestion put plastic spikes on every steering wheel to make all drivers think about their driving and only their driving ...with no distractions whatsoever.

Couldn't agree more! I'm not trying to oust PDI's for my own financial gain or to stop them qualifying, but safety 1st and all that! If I was a learner and discovered my instructor wasn't fully qualified I'd be out of that car faster than you could say, "It's ok love, I'm nearly qualified!"

Until a better consultation is achieved with more thought rather than this draconian approach better to stay as is.

the proposals would be in my view unworkable and extremely costly both for the PDI and the ADI.

Would be instructors need some degree of realism and protection BEFORE the commence training. the final qualification numbers are woeful and show just how much money is spent on fruitless training by PDI's

The whole system is in need of overhaul. It is not right that clients should be taught by trainees

without some qualified presence in the vehicle.

current system is not satisfactory at all

What we need to do is retest existing drivers every 5 years. It is there bad driving that is a bat influence on new drivers

I can see no benefit to only changing the trainee licence system if the intention is to improve training.

The qualification route also needs updated as response to Q9

ideally trainees should have some experience/qualification beyond Parts 1 and 2 before they are able to teach.

In some instances the existing qualifying tests are inconsistent.

The system definitely needs changing

Trainee licences should remain in place, however, it is impractical with the existing practices to implement an ADI to accompany them on every lesson. ADI's have to earn a living and have ther own business to run.

ADI training needs to change in line with the new standards check, particularly where coaching skills are concerned.

There is a lot that could be done to improve the training process and this is far too complacent an option. At the very least, major changes in the subject matter of the PDI process is required.

I think that it is ok as it is but maybe give access to more CPD courses that arent just money making shcemes and not necessarily any real value to keeping ADI's at pace with modern methods.

Existing qualifying exams are appropriate.

The Trainee Licence scheme has a use but it has been abused because DSA has never enforced its conditions sufficiently. We have processes that work they just need policing better

It works

If this were the case new ADIs would not meet the new standard and learners would not be getting the level of tuition they deserve.

I would like to see changes to the qualifying exams as well.

Trainee license should still be used but only as part of training not for reward

I strongly disagree. The system currently in my opinion is not " fit for purpose"

I think you should also be looking at reforming the learners practical test as i think it is not really fit for purpose

The whole system needs a revamp to make it a respectable career, not just a pin money career.

There is a strong case to change but this must be carefully balanced against the risks. Whilst we support the proposed changes to the trainee licence scheme, these changes must be part of a more comprehensive, modernisation package. We feel Option 2, and our replies in relating to Q7 to Q9, would give a well balanced approach that will maximise the potential benefits of a more academic approach, whilst maintaining the strengths of the current system.

More should be done to make the public aware that a trainee licence holder is not fully qualified

We should help both the trainee ADI and pupil to gain more from the trainee licence and get better value for money as too many trainee ADI are not making the grade and losing money

Its time CPD was brought on more. I see pupils who dont know the basics when they change instructor. Many dont have a training record card and leave 'deals' because they feel they are not learning anything

Will any of the changes make a difference?

In my opinion every trainee licence should be "bonded" to an ADI, and that ADI should supervise and coach the trainee throughout their whole period of training. I think a ratio of 1 in 5 lessons should be fully supervised and the revenue earned on supervised lessons paid to the ADI, along with any fee for supplementary coaching and tuition of the training. Being a trainee should be about gaining knowledge and experience and much less about making money. The trainee has to earn sufficient money to run their vehicle, but the priorities of the trainee should

be to their client (to give the highest standard of tuition) and themselves (to gain the maximum knowledge and expertise from their ADI coach). Companies & schools that have used the trainee scheme as a cash cow should be encouraged to ensure a personal service is given to their trainee. This will endear the trainee to the company and is likely to make them more loyal and committed.

it is already broken, it is time to fix it.

If neither option 1 or 2 become the new model then this would be the only time I would agree with this proposal - as above the trainee licence has been open to abuse for years and should be controlled / stopped

Already too many ADI's, made worse by PDI's being used not to learn the job but to provided an income for the franchisor

will the DSA enforce it if so how ?
how will you be able to enforce it should a badge not be shown?. badges at present are not shown by many instructors and there is little enforcement of this requirement.there are not enough enforcers of the legislation.

This route is still open to abuse. Also I think a revamp of the whole system will be refreshing for the industry and those within it who are "doing the job right"

It needs modernising

It would be beneficial if pass rates were published, and ADI's were graded relating to them, which is a truer reflection on their capabilities, rather than a "snapshot" pressurised lesson on a Check Test

No one should be able to teach driving without being fully qualified .

The process needs updating to reflect the needs of the modern driving environment.

Change is good! Lets give the industry a boost by encouraging fresh ideas all through.

It does need changing... I just don't believe that you fully understand the issues, many of which are about how it is managed now.

I dont know any other ADIs who dont want this option..

Read the previous note. Who is going to finance two instructors in the car. Lessons are already at a rock bottom low, with cut-throat competition

Again there are too many unanswered questions to form a very strong opinion either way.

The current system is open to abuse by training providers both small and large so it is a good move forward to have a more modern approach to the entire qualification route.

As per Q.10. Doing nothing to ADI/PDI training is not an option.

It is not clear in the Consultation Paper how these changes would be beneficial as the main focus in the paper has been given to option 1.

with a view to the changes taking at least another 2 years and with many many rewritings before it meets all requirements is it not worth looking at this option as an interim? and find other ways of supporting PDIs who are currently very unsupported and a little lost with no real shop floor help and support to help them gain experience

In my opinion, the system is much in need of a major overhaul. We trail behind much of Europe with our current standards of selection, training, assessment and testing.

Reservations as per Q.9. Doing nothing to ADI/PDI training is not an option.

only allowing trainee's to teach when accompanied by a qualified ADI, will never work. The ADI will want paying for observing, so where will the trainee make their wages from? they still have bills to pay, mortgages to pay, etc. the only way that this system would work is if the trainee worked for nothing

This option is saying that we have a system that cannot be improved on.
If anyone believes that of anything then they are deluded.
The system can definitely be improved, it is just a case of working out the best way.

The trainee licence needs a radical overall.
There needs to be some changes because the system is abused. PST's are just teaching the trainees to pass the test but not be an instructor and teach them how to teach people to drive.
Therefore we believe that there should be some reforms with the way instructors are trained.

Doing nothing is not an option therefore a change needs to take place. See response in section 10.

in my opinion doing nothing is not an option

The whole system should be modernised in light of the findings from the learning trial (as yet unpublished), the proposed changes to the way learners are trained and tested as part of a comprehensive strategy to improve road safety. It requires far more than just reforming the trainee licence.

I believe that the only changes should be made is to add Commentary Driving on the Part 2 test. No other changes should be implemented. I don't agree with following:

- Lerner accompanied by an ADI at all times whilst providing paid instruction
- inform the customer immediately before the start of each lesson, and in the presence of the ADI, that they are only partially qualified

PDI would not earn anything because an ADI would want their money plus I would charge the PDI for allowing them to teach my students. Also a student would ask for a discount. It would not look professional if an ADI would have to involve in the lesson or perhaps you would need to create an additional training for ADI to manage the situation. This will lead to more bureaucracy. We all know that person learn best on the job, also PDI is not a person they are well trained teaching bodies who passed difficult tests.

The largest training facilities are responsible for the woeful state of the training system that we have today. It has to be overhauled urgently.

I agree that the trainee licence needs to be improved and that the public should not be taught by unqualified or poorly trained ADI/PDI's

Strongly disagree. Improvement to the current qualifying process is absolutely necessary.

As per Q10. Doing nothing to ADI/PDI training is not an option.

Sometimes, after months of consideration, it does transpire that doing nothing is the right option. The UK has one of the best road safety records in the world. Focussing on the biggest problem is the right thing to do and so we completely support the need to tackle the issue of road safety for young drivers. Changing the route to qualification for driving instructors will have little impact on that and is only likely to increase the cost of learning to drive. This may lead to pupils being trained for fewer hours by a professional instructor and hence have a detrimental impact on safety. □ We have already commented on the issue of requiring an ADI to be present when a PDI is giving paid instruction in our answer to Q7.

The proposals to require a trainee driving instructor to have an ADI in the vehicle for all lessons

is impractical without heavy increases in training fees, although some control is needed in view of the number of trainees who do not pass the part 3 examination.

Ministers should consider amending this option to require 25% of lessons to be supervised by the training ADI or organisation with a possible caveat that the first ten lessons must be supervised. This would lessen the inevitable increase in training fees.

Ministers should also consider the unsuitability of current regulations which allow the training of driving instructors by any person, qualified or not. While option 1 does this by default, the arguments against option 1 are stronger. Ministers should consider amending regulations, if necessary introducing legislation to restrict driver instructor training to ADI's who join ORDIT.

Ministers should also look carefully at the DSA declaration to comply fully with the EU directive 205/36/EU. This bombshell hidden within the consultation paper would allow driving instructors qualified in other EU countries to enter the UK and provide driving lessons without any initial assessment of subsequent checks on their ability and standards.

As it is widely acknowledged that driving standards in other European countries are far below British standards, and the majority drive on the right hand side of the road, this open door is a serious threat to road safety in Britain.

Ministers should also consider that as these drivers would not be subject to check tests there would, once a significant number were operating in the UK, be a potential case for a legal challenge to the continuation of the check test as being discriminatory against UK ADI's.

I have long thought [as an ORDIT-registered Trainer [1999-2011] that the Part 2 and 3 tests are fine : that it's quality of training which matters for PDIs [ORDIT non-compulsory] and also the DEDICATION of the PDI which are key. □ Better "vetting" of candidates for training was once mooted by DSA so as to make them aware of what they were taking on, and the level of dedication needed to succeed. □ Alas, I presume that this would now be interfering with Civil Liberties...? □ If someone 'fancies' training, they can train!

only allow ORDIT trainers to give pdi training again pdis have been ripped off with poor training hence the low pass rate.. shameful

The system as it stands needs to be updated. The trainee licence scheme is not fit for purpose. This, however is mainly due to the companies that option 1 would give the power to!

THIS IS NEEDED AT LEAST

The trainee licence has been badly abused by some companies and the level of tuition from some trainees is shocking. Also the public have a right to know that their instructor is a trainee and fees should reflect this.

The qualifying process must be made more challenging - the candidate must have a teaching qualification before applying and this will remove the high sales "You can be a driving instructor in 16 weeks" and would mean all would be ADI's would have a teaching qualification. There are too many ADI's on the register and we have the lowest pass rate and cheapest lesson prices in the EU with the average being 40 Euro per hour. Many ADI's are failing the check test - I do Check test training and am often applauded at the standard of the ADI and the poor teaching methods - the new Check test is long overdue and will go some way to help improve the situation but I am worried that the new proposals will open the floodgates and with mass marketing the larger organisations will flood the market with new ADI's - which will in turn lower the standard

The qualification process as it is now is OK, but the trainers are milking the system. They are NOT interested in road safety but how many PDIs they can get through their books. It does NOT matter if the applicant does not succeed at the end as they have already paid in advance for their training. Get rid of RED driving School

It works, leave as is

Changes need to be made. Market is saturated with poor adi's.

My strongly disagree means that I feel it is in no way sufficient to JUST reform/remove the trainee licence scheme

It has been abused by larger organisations for a long time. The larger organisations would insist that the Pdl has to do the hours instead of focusing on the training required to deliver a quality lesson

I agree change is needed as in my previous comments, this option is nowhere near enough

It is high time to implement a strategy that will force the closure of mass Instructor training providers like RED ,BSM, and Bill Plant, that have for too many years, duped, lied and failed their clients in so many ways to provide ethical business plans, or strategies. They are degrading and devaluing those of us that are moral, upstanding & still passionate about what we do. These operators have become the rouge trader's of our industry are slowly killing our Industry, and need to be shut down fast!

ORDIT should be made compulsory and trainee licences discontinued as the system has been abused.

The Trainee License should be, in my opinion be more stringently monitored. I hear a few

people remark that they have not had much guidance from their 'mentor'!

And leave the trainee licence system alone too.

Doing nothing as per question 10 is not an option

I do not agree with the T/L scheme being changed - again I would say the scheme is good & an excellent way to develop people to become instructor - DSA just need to manage it better. Also if you have concerns about road safety the reduce the number of faults on the Learner test to 6, the same as ADI part 2, this sets a higher standard & address's the safety issues!

Surely it would be more cost effective and less disruptive to simply make the current system work as it is capable of doing. ie. Properly.

This can be described as the "Do teh least we can get away with" option and miisses a big opportunity to make things better across the entire industry

You cannot hope to have an excellent system whilst you allow anyone to train drivers eg mum and dad

Changes are required, The existing process tends to be kind upon 3rd attempt candidates,

The current system needs to be brought more in line with the National Standard.

We **STRONGLY DISAGREE** with only changing the trainee licence system. Withdrawing the trainee licence system is important and long campaigned for by the industry but if standards are to be raised it is not enough on its own.

We strongly disagree with only changing the trainee licence system in isolation. We would strongly call (and have done for many years) for the removal of the trainee licence. Although much more discussion is necessary as to the scope and nature of future initial training, under the proposed vocational route the trainee would be more adequately supported, developed and monitored in their training by senior, qualified fellow professionals and they (and the profession as a whole) would benefit from a more robust training mechanism.

There needs to be a holistic approach to improving the initial training, qualification and post qualification development of driver trainers otherwise there will be the continuing issue of disjointed and inconsistent quality of initial training, resulting in an inconsistent quality of driver education as a whole. It will create inequities in the profession and, even with the proposed changes under Option One of the consultation (i.e. wholesale development of the driver training framework), there will have to be further work and discussion to ensure these inequities are

effectively managed.

We **strongly disagree** with only changing the trainee licence system. Withdrawing the trainee licence system is important and long campaigned for by the industry but it is not enough on its own.

Disagree. Reservations as per Q.9. Doing nothing to ADI/PDI training is not an option.

Not supported.

Feedback on question 13

Is there any further evidence about the costs and benefits of these proposals which we should take into account?

The explosion of trainee instructors over the last few years was primarily due to 'personal loans' being made available via unscrupulous companies. The DSA should consider quotas and sanctions for any organisation failing to deliver competent training.

As cost are so high it is better that an ADI has to supply a pupil and be able to book their own check test to suit

You suggest if the awarding organisation fails that there maybe an interruption to training. How will that affect those partly trained/qualified. What additional cost might they have to bear. I appreciate that this maybe trialed and could return to the DSA responsibility..

Phone RED or the AA and ask for the full price of a course.

Some big instructor training schools may well resist. They have a vested interest in the franchise fee's they charge PDI's. However they have failed their customers consistently and many have dubious business models. They rely on the franchise income from PDI's lacking knowledge nad will not grumble about too few pupils. They deserve some scrutiny before weight is attached to their opinions,

could not comment□insufficient information

There could be a reduction in the possibility of training costs if highly trained and experienced but not thought of personnel which are not considered are used

o take a complete and wholesome look at changes to help improve road safety, would be to give traffic police their budget s back to effectively deal with road offenders and introduce safety/refresher checks for ALL uk licence holders. Thats where the biggest problem is.

The greatest cost/benefits impact would be from weeding out underperforming ADIs - not by trying to guess who these might be before they even get accepted for training. It is impossible to pluck a weed before it has grown.

Try to justify why I went nearly 11 years without a check test , Paying licence fees for a few

copies of dispatch , which simply extolled the virtues of the DSA. Fines for non-compliance ?

Difficult to gauge given the attrition rate.

That learning to drive is test pass oriented which leads learners to see that goal and get hooked by larger companies that have more instructors and can offer the broadest service - the intention to take PDI's out of the delivery except when accompanied by a qualified instructor is probably one of the best [possible outcomes as it can only lead to better tuition, better training for would-be instructors (PDI's) and inflates the value of existing seasoned ADI's (like me)

make adi pay not candidate

the public needs to know if their instructor is properly qualified to teach and if training is being mentored by ADI whilst teaching . Seperate fees will encourage more unhappy ADI's to exit the training industry , due to rising cost . It is a requirement from DSA that we have regular "standards " test , why should we pay ??

the driving lessons should be a lot cheaper for those who are on benefits or looking after a disabled person like it looks after a disabled person

Any cost needs to be a fair balance to what it is supposed to represent and achieve.

I don't think cost and benefit should have anything to do with this process. IT has cost me a small fortune but I have had no benefit!!

the only thing about making people pay separately for a check test will mean a lot of people will see this as a way to make more money out of ADI's. The check test payment will not reflect the reduction in the ADI register fee.

Our industry has been hit hard by the recession and ADI's pockets are empty. We would welcome a monthly Direct Debit Scheme or yearly fee as opposed to the current £300 fee, which is a lot for an ADI to pay in these economical times.

Charging extra for an additional Standards Test for lower graded ADIs is wrong and will pollute the system badly. There is no evidence that rehearsing for a Check Test and getting a Grade 6 means 'better' instruction in the real world. There is no evidence that Check Tests actually raise standards anyway.

I feel that splitting the ADI registration and Check test fee will result in more costs.

There would need to be strict auditing of training institutions to ensure they do not exploit, financially, prospective PDI's.

In summary, option 3 is needed now. Once supervision of PDIs is working, option 1 can be implemented.

Introducing such sweeping changes will inevitable increase costs for thousands of struggling ADI's who continue to work for rewards equivalent to well below the national minimum wage. Increased costs will cause a reduction in the quality of instruction given because instructors will be forced to cut corners, squeeze too many lessons into the working week resulting in tiredness and it's associated dangers and to save more fuel by spending more time lecturing while parked rather than coaching the pupil in practical driving skills.

cost of both ADI & Fleet licence is large at present and should cover cost of check tests or a reflection in reduction of registration fees to balance out overall cost

Yes. There is . Compared to the £3.5 million the DSA will have wasted paying rent on their old headquarters (Stanley House) this is only a minor waste of money. I make these comments and the preceding ones in the full knowledge that they will be ignored.

There should be some government-backed scheme to assist trainees to fund the the training scheme. University students have options, ADI's don't!

Potential for loss of earnings for either PDI or ADI if the trainee licence remained and followed this path

Currently dirver training results in new drivers failing the test, where, all around them qualified drivers are driving dangerously, so where is the point in making it even harder? A complete lack of ANY police traffic cars, (and the knowledge that that situation exists). allowing drivers to drive as they wish is the problem.

The benefits far outweigh the negatives. The organisations that currently recruit ADIs are only really doing it to make money from Training them, they don't really care if they pass or fail. The wastage currently isn't sustainable as some people are spending their hard earned redundancy cash or savings to train and never actually become ADIs. In my opinion the current system only teaches you to pass the part 3 and doesn't prepare you to become a "Driving Instructor".

There is ONLY road safety and the integrity of the testing process to consider.

The costs of a life. If you are saying that all these changes are for the benefit of the young and

the rough to become a ADI then the cost of a youth should outweigh the cost to the ADI purposes. This should not be a level 3 NVQ or Btec, it should be higher so that the change have an impact on the percentages of deaths on our roads.

2. Why should the off road industry's have not to comply with the changes as these come under the road traffic act. It should be now that it should be made clear to those industry's that they need to be an ADI if they want to perform those services to the public.

The quality of the people attracted to the industry would improve if the re-numeration was higher, lesson prices are too low due to many factors, make it more difficult for poor ADI's to exist and prices and standards will rise, higher standards will then naturally reduce accident rates.

Costs and benefits to who? Trainees, Trainers or DSA?

DSA should not just think about saving money for itself ,but think how it can help the 40,000 ADI's already suffering in this economical climate.

How will this be budgeted for by the DSA? I wonder how many people will drop out if they have to pay for check tests, especially if its in addition to registration. This could lead to not only a lack of instructors but also a lack of planned income for DSA.

More trainees would pursue the process if there was not such extreme price cutting by bigger driving schools, they see recouping costs as unlikely and potential to be busy unlikely

How would this impact on the number of examiner's at test centres. Training would have to happen still. How would this occur in rural areas?

We have concerns that outside organisations would build the ADi process into a larger NVQ style package and with external sign off the process would be open to abuse.

As ADI's are considered self employed, even those working for large organisations like the AA are exempt from many Health & Safety legislations. These technicalities should be addressed

Putting small businesses on the scrap heap helps no one. The next step will be a partnership between the AA and red to buy halfords and no one other than their pupils will be allowed to sit a test

It is assumed that the same number of people would start the qualification process. I can not see how this would be the case. The time commitment coupled with the loss of income while

training would simply be too high

Option 2: AO would be able to set a standard across the industry of the training.

There are no minimum prices for lessons. Whilst the Adl is self employed, the benefits to the new Adl, will be difficult to recoup vs. pile them high sell them cheap lesson merchants as well as voucher discount schemes, ie Groupon etc.

the DSA already over charges us for our licence every 4 years?

VERY UNCERTAIN HOW THE COST STRUCTURE COULD WORK ,IN TRAINING ,□IF TWO INSTRUCTORS WERE INVOLVED ON EACH TRAINING SESSION

If a candidate needs to provide a pupil for the Part 3 test, they will need experience teaching learners, not just role-playing instructors. However, if they can only teach with an ADI present, that will be expensive.

Profit & loss to adis in present economic climate more expence for adis we would have to pass on to students or loose out

Not that I can think of

Not so much as the cost of the proposals, but how are some ADI make a living from cheap lessons. Good tuition = a fair tuition fee.

I believe that the benefits have been overstated in order to improve the chances of the cheapest option being successful.□The overriding consideration should be road safety and the maintenance of driver training standards in the UK.

Driving Instructors will struggle to pay for extra training as everyone is cutting prices trying to make a living.

NVQ's are a good idea delivered badly. folk running these courses need passes so they blatantly help candidates in exams to make sure they pass. wheres the learning there?.non english speaking applicants need to become fluent and knowledgable before undertaking these tests

take note and act positively on the opinions of ADI's rather than academics who have no knowledge of actually teaching/coaching Learner Drivers.

Not to use this as an excuse to increase ADI fees

At this time aware of none

I personally think we should pay for things separately

The cost might be higher than anticipated

not i am aware of

Don't know

Benefits to whom? I cannot see any benefits at all to current ADIs. I believe that the vast majority of pupils are satisfied with the service they receive from their current ADIs.

There is no evidence to support or reject the financial proposals, and I do not believe the proposals have been thought through thoroughly at operational/street level.

Professional training ?

The DSA was losing money somebody in a office looked making money hence CPc etc

The DSA should seek to retain experienced, dedicated and committed professionals (ADIs) in the industry if it wishes to improve the education of young drivers. It should set out this as a key motivation in its proposals and reforms. Referring to ADIs as 'members of the public' in its impact assessment does little to make ADIs feel wanted.

waste of money

The hire cost will deter the ADI to have training and become an ADI. So the DSA will lose revenue as there will be less attraction for this profession.

Instructors who fail the test should be required to pay to retake the test and that should be the only change.

why is there a need to increase costs when the present structure can be changed without incurring more costs.

As above raising an essential item by 50%.

I am a little confused how the DSA will make money from ADI's alone if they are not charging for parts 1,2 and 3

No if 99% take lessons then great.

If an ADI supervises someone on a trainee licence then that ADI will usually charge the PDI more than a standard lesson fee. This will incur costs to the PDI if they have to redress the balance.

Any changes will take a great deal of adapting to and any benefits will not be seen for some time following the introduction of the new proposals. However it will make sure that a large amount of people not completing the 3 parts, for whatever reason, will not be losing out on all the money that they have paid into the training system.

Outsourced services nearly always incur more costs than anticipated.

free pink licence for one month or one year cost of £400.

I feel that the DSA could have contacted and surveyed PDIs who never completed the qualification process. This may provide some useful direction for the required action.

I think that you should demonstrate firstly how you arrived at the figures you have.

It would be good to flush out the rogue training individual & organisations but it is probable that these same people would make minimal changes to stay in the lucrative ADI-training market

private companys always increase costs especially in a monopoly situation. Look at PFI in police and NHS

Disagree - We have no further evidence about costs and benefits.

The areas of population can make it hard for ADI's .

CPD can cost money and a days wages.

It would be useful to provide some basic examples of costs. e.g. the set up costs for a small

ORDIT organisation making the transition to become an accredited organisation under option 1

There seems to be an assumption that there is a constant supply of pupils for PDI's to train, I don't think this is the case. I don't know how a PDI will be able to find pupils to teach whilst qualifying. The cost to the pupil will be shared between the ADI and the PDI, therefore there is unlikely to be any financial benefit to the pupil, so I believe that most pupils will prefer to train with an ADI. Also will PDI's be allowed to advertise for pupils?

Lesson cost per hour vary

Reduce the cost of the test fees for pdi's & split the cost of the check tests & make it payable over two years

I think the way everything is keep to that

Car and motorcycle regimes will differ in terms of costs, benefits and assumptions; therefore we have no express view on this point at this time

There are a lot of "Trainer " out there who are pinning would be Instructors shirts up ☐ They are there for Part 1 and 2 But no idea how to get Instructors past part3 !

The costs of training are incurred by the trainee &/or the training organisation NOT the DSA. The training process self-regulates under the law of 'supply & demand' while the DSA test vouchsafes an acceptable standard. Hence the DSA/VOSA need not involve itself in the methods of training.

I feel the proposals should be extended to cover all driving instruction in all categories of vehicle

Costs in this day and age are always being cut always at the expense of what is being provided.

yes the effects of increasing the number of available registered instructors has a negative effect on quality of instruction.

Who knows - probably, but time for organisations such as DIA is going to be required - come to think of it why not ask the DIA MSA Rospa etc sort is out and present to the ministers in question how it should be IA perfect world?

The DSA seem to be ignoring/shirking any responsibility about costs of trainee PDIs plus ADIs being used together to train pupils (eg who gets paid/who doesn't...)

Yes as you have stated most ADIs are self employed, and the cost of sitting in with a PDI or trainee, would have to be passed on to the trainee, thus increasing the initial training cost quite considerably.

The payment for the trainers should not be dependant on the pass of the trainee, as this would result in a poor quality of ADi in the industry.

for the scheme to work properly you must have minimum standard fee for the whole training

The costs always fall on the self employed driving instructors for any changes made by the DSA they never give money of cheap loans or any other type of support to their driving instructor but are more that willing to play god by policing actions which cost us money

"affiliation fees" to the awarding bodies, additional costs of keeping the qualifications current.

Difficult to assess in the short consultation period

No idea !!

Cost of adi and dpi in one lesson during qualification

No idea because i dont know costs involved havn't been discussed to my knowledge

There is no assessment of the costs to the PDI of the arrangements proposed for supervising their lessons. Whilst I appreciate the logic there is no way a PDI who is say charging 50 to 60% of the ADI rate for a lesson can then afford to pay the ADI present a reasonable amount for each lesson. Would it not be better to have the ADI present on say at least 25% of lessons to ensure the quality of lessons being provided. In this way a reasonable economic structure could evolve between pupil, ADI and PDI.

I currently get from the AA an average of £26/hr as a trainer and of course there is an overhead on this for the AA.

I haven't looked enough in to this area and as such I don't feel I am able to comment.

Most ADI's appear to be struggling to make a decent living. The DSA/Government don't seem to accurately understand our financial constraints. It is not cost effective for people entering or who are already in the industry.

The costs involved will not bring about an efficient industry. It all sounds good but unfortunately standards will drop and not improve. The cost will be loss of revenue to the authorities as more and more ADIs will leave the industry and far fewer applications will come in from new entrants as it will not be financially viable to become driving instructors if a vocational qualification is required. They will earn much more from that in other industries so why would they bother training to become driving instructors?

The cost will be borne by ADIs and learners, so no change

ANY PRIVATISATION WORK INEVITABLE PUSH UP FEES

Pupils and trainee ADI will be offered a better service by these new proposals

Regional variation - If you do the same analysis on several urban areas across the country and compare these with your generalised conclusions, you will soon see your figures do not tell the truth for most ADIs. Take as an example the following Cities and analyse your collated figures for each individually and the variations will be obvious - Leeds (my home City), Bradford, Manchester, Birmingham, Glasgow, Edinburgh, Nottingham, Sheffield, Cardiff, Belfast, Bristol, Canterbury, Norwich, Ipswich, Cambridge, Doncaster, Milton Keynes, Northampton, Peterborough, Portsmouth, Brighton, Southampton and compare with London.

Not that I can think of.

Keep it simpler so those of us in the business can offer more useful comment.

Don't cut too much ☐ it's a skill for life not cost cutting exercise

the amount of fee each new ADI pays at the moment should never be higher than the current Fees.

not had time to research due to consultation doc time limit.

It also concerns me as an ORDIT registered instructor what the financial outlay and extra work involved is going to be.

Tell people what is going to cost whether you do it in a crash course or over a period of a year.

The costs should be met by the DSA and not passed onto the Instructor. It is hard to make ends

meet in the current economic climate without further charge upon the instructor.

We are talking about peoples lives being saved as the final bottom line. This is something that cant be fully quantified in £s' unless you are the person concerned or someone close to them.

This is too complex to properly answer without more detailed information. I am hoping that the Instructors Associations actually wake up and make more 'formal' challenges to prevent this being pushed through...We need more information in other areas 'before' this can be considered...

Dont make changes just for the sake of it, or cost cutting. The government agreed to merge customs and excise with the inland revenue for cost cutting reasons, look at the mess thats made.

Who is going to pay?

The training centre will have to pay for accreditation, handbooks and resources, a fee for each PDI to be put on the training scheme, a twice yearly inspection from the accrediting organisation, an external verifier for each student. These costs will be passed on the the student plus they will have to pay for their exam, their registration with the DSA, their DBS check and their check test after 3 months. I am baffled at how you can think the cost of this course will be less than £2500 for a PDI when I am sure the training centres will need to charge much more than that! At the beginning of your consultation document you make a very unrealistic assumption of the earnings of a driving instructor and take very little notice that the majority of instructors charge under £20 per hour, have huge petrol and insurance costs and usually only stay in the business for 2 years as make no money!

Ask the adi

Don't know at this stage

I know about "the user pays" but all costs should be proportionate and not over charged, as the CRB check was through the DSA, when it was advertised at £44 on government web pages and ADIs paid much more, (£60).

An accredited training centre will need to pay for the accreditation, handbooks and resources, pay a fee for each person to be put on the training scheme, pay for twice yearly inspections from the accrediting organisation and pay for an external verifier. These fees will have to be passed on to the PDI. On top of this the PDI will need to pay for their exam, their Check Test after 3 months, their registration with the DSA and the DBS check. It is totally unrealistic to state that the vocational course will save PDIs money! The only way this can be done is by

filling classrooms with students and reducing the in-car training which will not guarantee a quality PDI with high teaching standards and in-car teaching experience will be put forward for their exam.

Lowering costs will not provide a higher qualified instructor base. It could be argued that increased costs will lead to more committed and professional individuals as they have invested in their future

Assumption on average lesson cost should be more regional than national.

i think it is naive to think that the Training Centre will not be passing on their costs to the trainee for all their expenses, the need to employ external reviewers, twice a year review, accreditation, costs for exams and course resources, DSA registration, individual registration and DBS as well as being able to make a profit worthy of making a living. how can this possibly work out less than the assumed current quoted cost of £2,600?

We know about "the user pays" but all costs should be proportionate and not over charged, as the CRB check was through the DSA, when it was advertised at £44 on government web pages but ADIs paid £60.

In particular this was done before the proposed changes to VOSA, which would change any cost projections.

Following my answer in section 12 then I certainly cannot give any further evidence.

The evidence is available. Unfortunately the limited informal consultation that has taken place to date has failed to engage with the majority of those who will be impacted. A full unbiased analysis of the implications of option one needs to be carried out before any decision is taken.

I cant see any benefits in the proposal. No financial, no road safety benefits.

Look at areas/ localities

If ADI qualifications are dumbed down it will lead to an over supply in the industry. Any revision of qualifications must make sure the correct people are entering the industry and at a sufficiently high standard. Indeed we need to avoid the redundancy bubble effect that we currently suffer with huge influxes of instructors. We know that many of these will never make the grade. My concern under any revisions is that a proportion of these will now find their way through but will not be suitable to the demands of modern day driver training. They may well choose to leave the industry and so we will have a return to the peaks and troughs in numbers. One could say that there is evidence to suggest the numbers on the ADI register should be controlled to help

prevent standards dropping.

The cost of an independent ADI trainer changing their business model. The impact on the industry of independent ADI trainers ceasing their business because of the prohibitive cost of changing their business model.

If this system is going to allow more ADIs on an already saturated market it will make this an unsustainable profession. You will move the goalposts and we will end up paying more and more. If you refund the same as we pay out then ok , Track record is bad and I don't trust you.

the public and pdis are not getting valu for money and your to blame for not changing the system

The "less than 50% pass rate and wasted cost in not qualifying as an ADI" is more to do with the training not being up to the required standard. The quality and fitness for purpose of the training should addressed.

Please see the comments above. Many of the most experienced and trustworthy trainers in the country would be affected by these proposals. Please do not assume that the big organisations speak for all. They speak of their own self interest

IT IS TOUCHED ON BUT A TRAINEE HAVING TO BE ACCOMPANIED BY AN ADI ON ALL LESSONS, WHILST VERY MUCH BETTER FOR THE PUPIL WILL IMPACT ON TRAINEE'S INCOME AND/OR ADI INCOME, THEY ARE NOT BOTH GOING TO BE PAID A LESSON FEE.

As above - money has already been spent on the training of examiners

This seems to be about saving money, hence putting cost before benefits in the sentence above. We should be maintaining the high standards which already exist. If "it's not broken, why try to fix it". This appears to me to be just a cost saving measure where standards would fall.

ADis pay to much towards it

I cannot envisage a situation where an ADI supervising a trainee would willingly give up some of their lesson fee to the trainee. Therefore costs to the trainee will rise considerably, this could be ameliorated if the Revenue and customs could be persuaded to make these costs allowable against tax as self employment set-up costs.

I repeat my previous comment. May I have more time please

I agree, to foreseeing it entirely feasible that these new proposals could create new post throughout the driver training and testing industry. It would Increase & maintain training standards, by weeding out the weak, and strengthen the fittest. Thereby providing the new driver and general public with a much needed better quality of service and driving standard, that the remaining fittest ADI's could charge realistic professional rates for.

Any decisions should be based on potential increases in road safety, as advised by the HERMES project, and modified by consultation with driving safety organisations. They should not be simply financial ones based on costs to the DSA. □ Any transition will involve expenses. These ought to be part of Government budgeting and ought not to be raked back from existing training providers. □ Your own assessment is that many good existing trainers will leave the industry as a result of your proposed changes. This would seem to be tilting the balance in favour of predatory organisations, despite your assertion that smaller providers will be protected.

Only that costs should be proportionate with no overcharging as per the ADI CRB checks.

increased cost burden on PDIs of being unable to defray some training costs with trainee licence

The risk of devaluing instructors working under the current system. Waste of my time trying to read a document I don't understand about things that may not affect me. I have no confidence that it will make my work better!

It is more a question of using the existing information correctly and not trying to make the figures fit the desired outcome. There should also be extreme due diligence with regard to tenders received from outside contractors - are they accurate? - or are they just trying to secure the contract?

The proposal smacks of an attempt to find a way to raise revenue under the guise of "improvement" actual improvement in these proposals is very thin on the ground

If an ADI wants to become an assessor then they should pay and become one. I feel that the ADI qualification is only the starting point and should not encompass all areas of the industry. Many other professions have to pay for qualifications to enhance themselves why should ADI's be any different?

The CRB check costs and other costs should be proportionate for all areas of our fees.

how many attempts will the new learner be allowed to pass a standard check?

Do not let the additional cost of keeping the DSA in the loop influence your decision. Those in the industry who have a commitment to driver training and road safety will be prepared to bear these costs. Continued DSA participation is I believe essential to the medium to long term success of these proposals.

Keep one fee for all and extra standard test to be charged

When considering the option of enhancing the Part 3 by removing role play and instead having a real pupil, it has not been considered how this will be financially viable to the PDI. To gain experience with a learner driver, and in preparation to use that learner for the Instructional assessment, vehicle and insurance costs would be incurred by the candidate. These have not been allowed for in the impact assessment.

Don't know. Lack of informant re costs

Legal guarantees with a severe penalty for those who violate agreements.

We do not have sufficient information to provide a counter argument against the anticipated costs and therefore can neither agree nor disagree. However, we believe the scope for the basis of estimate is comprehensive.

We conclude that the cost benefit analysis is comprehensive and complete and has been conducted by experts in public expenditure economic analysis.

We **agree** that cost benefit analysis is comprehensive however; we are concerned about its accuracy.

We know about “the user pays” but all costs should be proportionate and not over charged, as the CRB check was through the DSA, when it was advertised at £44 on government web pages but ADIs paid £60.

Same response as for question 5.

Feedback on question 14

It is proposed that civil sanctions are introduced as part of the process by which the Registrar enforces compliance within the ADI registration process (paragraphs 95 - 101 of the Consultation Paper). How strongly do you agree or disagree with this proposal?

Enforcing may be an issue and will there be an appeals process?

Lets have some teeth to the structor. If the job is done right the no-one need be worried about sanctions

Financial penalties will only encourage ADIs to increase prices or "add on" lessons to recoup losses. A supervised period to ensure compliance would be far more benficial.

This is a good idea, however how about extending the fines to examiners who make wrong decisions whilst their manager is sitting in the back of the car. Pupils fail test and examiner gets told at the end by his boss that it shouldn't have been a fail yet the pupil never finds out and had to resit the test. Why is it only examiners who are infallible

Depends on how and exactly what will come into play - how tough or lenient - you have to get it right 100% of the time !!

Without these sanctions, as now, the public has reason to lose confidence in us.

With no ombudsman style process in place for ADi's to refer to it is only the opinion of the DSA that will decide whether sanctions are correct. Unfortunately even the DSA's process go wrong and this would lead to wrong sanctions.

as long as its targeted, not just a cash cow

What nonsense. We have a justice system for dealing with non compilance. The suggestion that we should be giving such powers to a civil servant, because that is what the ADI registrar is, fills me with horror.

A good idea but who pays to chase these individuals?

I think all ADIs that have a pupil take a test must dispaly their badge. Some probably remove it if they feel a pupil is not ready and if they were my pupil the test would not take place unless pupil

is adequately trained.

Depends what the penalties are for

All ADI's must behave in a professional manner but more importantly must be seen to behave in a professional manner. Anything that spoils the reputation of ADI's should be punished.

peoples opinions, criminal sanctions where necessary. compliance is dsa saying we say jump

The above opens a whole can of worms leading to cross litigation from instructors re restrictive practices and dont forget 'human rights legislation!!!

Its a job, if people are incompetent fire them , end of process.

This would become a money making side to the industry that would take away from changing percentages of death's on our roads. This could actually cost lives especially in the different ways that it could be enforced or monitored. Look at speed cameras for example.

More control makes for better customer service

Revoking licence is sanction enough!

Fully agree, I was previously a Registered Paramedic and they have a strong regulatory body.

How will enforcement be implemented? There are still unqualified instructors regularly on the road!

This sound very much like a policy to get extra revenue from hard pressed ADIs. If we were given Professional status as in other European countries then this would be ok

I get far too many pupils coming to me from instructors who are very unprofessional that some policing is necessary.

did start my career as a PDI and, the school was supposed to supervise some or all of my lessons with real pupils which it never happened - thankfully I am a responsible person and I did my best to keep in touch with my personal trainer that helped me to maintain a level of quality delivering my lessons and preparing for the final exam.

It depends on what the policing regime would be and that it is an equitable process aimed at

really improving standards not revenue generation.

There should be sanctions for non-compliance/

Slaps on the wrist are not enough of a deterrent to 'rogue' ADI's

'Fining' a poor instructor is almost sanctioning bad instruction. The basis of check tests, initially to teach/encourage better tuition, but ultimately to have the power to withdraw a poor instructor from the register.

Some ADI's think they can do anything they like once passed part 3.

They will have to be seen to be fair and enforced.

I can't really see any benefits resulting from this apart from to the coffers of the DSA. Just the threat of removal from the register with, in extreme cases, adverse media coverage, court cases and possibly even prison is in my opinion and going by the relatively small number of such cases to date sufficient deterrent. ☐ I think the public is looking for some form of compensation where an ADI, in their opinion, doesn't do enough to get them or their family through the test as quickly or cheaply as they'd like or the ability to appeal and overturn the DSA Examiner's decision where they fail the test where they and/or their instructor thinks they should have passed. In my experience much of the former occurs with instructors who subsequently leave the industry so there is no recourse without civil court action and the instructor would simply ignore any DSA penalties. This is an unnecessary proposal.

I would rather be tried in a Sharia Court by the Taliban. It would be more liberating than this!

Pupils do need greater protection than they presently have.

It should be reflected in the grading of an ADI.

By far the vast majority of ADI's are hard working and honest individuals. I see no reason to threaten them with legal action beyond that already existing. We do a very difficult job very well, our training and testing ensures that. We would retain few customers if we did not provide an effective service. Why threaten us with legal action if we do not?

If ADI's can't follow what is required of them, then they should be removed from the register. 'Bad' ADI's should be removed, not fined.

HOWEVER... There needs to be clarity about the 'offences' from the outset by publishing

common examples. The single example given in the consultation document is not enough to assess the range of offences likely to be included.

The standard of proof is to be the same as for criminal offences. In the criminal justice system decisions on proof are made by a trained and qualified judge, trained magistrates working with legal advice, or a jury of 12 of 15 laymen directed by a judge. What training or qualifications does/will the registrar have to make these adjudications?

It is already a very hard industry to make money in so introducing fines is only going to alienate low paid people more.

The degree of professionalism required needs to be improved

Civil sanctions cannot be used against the self employed. There are already many regulations to protect the both the profession and the public

It seems that it will cost more to administer the scheme than it collects and will ultimately mean that the DSA will look for money to be raised elsewhere paid for by ADI's!!

Seems like the ADI registration is failing for this proposal to have been muted.

How would this be enforced. Penalties are only effective if set at the right level

The current sanctions, removal from the register, are sufficient.

Most if we are striving to improve not only our own standards but also those of the industry as a whole. I have heard some horrific stories of ADIs abusing their position and being inappropriate they should understand that if they cannot act in a reasonable manner and stick to the rules they will be punished in some way

This is not the way to treat the small business owner, there has to be better ways to deal with issues. This proposal seems almost draconian to me, a backward step.

£200 is too small to be a deterrent

£200 is not enough considering the ADI would have done it twice. and I think that the time elapsed should be 2 or 3 years as we should all be on top of our game at all times. I propose 3 years and £500 We are professionals afterall!!!!

Some ADI's do not follow proper procedures and teach safe driving for life .

make them display there badge at all times

I just cannot see how it will be policed - anyone can sign a register but it does not mean they are following the protocols. Its a reasonable idea and tolerance or build-up to get it right should be allowed but enforcing it will be an issue.

Perhaps criminal sanctions may encourage more compliance.

A lot of other industries don't follow this process... why should ADI's be any different. Everyone makes mistakes... its human. ADI's are covered by insurance when things go wrong.

If its anything like the "integrity" dept, it will not be fit for purpose. The first few years (6/7) of the integrity dept , there was an average cost of £240,000 per successful prosecution . I believe the average fine was less than £500 .

Very strict rules need to be introduced to ensure fair play

Communication between DSA and the ADI could be sufficient .

only because it will impact the sole trader more. Large driving schools are widely criticised and rightly so, for delivering substandard lessons by way of misleading pricing and little regulation over their own ADI's. Red, AA and Bill Plant are widely known for providing poor lesson quality. If civil sanctions are to also include this, then i strongly agree.

Yes, I think you need some teeth to deal with such matters.

I thinks there need to be more policing of driving instructors. A large number operate independently and there are few standard check or control - other than an assessment of their teaching ability once qualified. I thinks there should be more policing of instructors. This should also look at customer service and business practises of instructors also! I appreciate that this would increase a burden on the DSA or another authority but it would raise the standards of the profession.

It is time that action was taken against instructors that do not display their badge.□The fine should be higher and enforced

This option should solve the issue of missed check tests.

If we received 3 points from speeding, why should we face further sanctions from our governing body? You will push people away from the industry

The profession needs a kick. We as ADIs are out there to make the roads safer. If we cannot or do not want to do what we should be doing, then a penalty has to be there. Either it will make ADIs up their game or ADIs will leave. Either way, the public and clients should benefit.

This smells of big brother. Will these sanctions include an ADI disagreeing with an examiners test result or being unavoidably slightly late arriving for a test.

Will there be an appeals procedure?

There are already legal sanctions in place and an agreement to work to standards. It would be inappropriate and would foster an 'us and them' environment. Something the DSA should be working to prevent

It is not the DSA's place to impose fines on people. The fact that they choose to call it a 'civil sanction' just highlights the fact that they are trying to come up with revenue generation schemes. Who decides what the sanctions would be for? And what if the DSA fails in some respect, would the return scenario apply, the DSA would pay the ADI?

check tests should be enough□is it just for raising money?

Unnecessary. The registrar doesn't need any more powers. If safety is the DSA's business then various registrars haven't demonstrated much ability in the past. They are administrators only.

This will be the thin end of the wedge on a road to enforcing disproportionate penalties for financial gain

the existing code of conduct is ok

has anyone suggested a system of rewards/incentives for proper compliance ? The "browbeatings will continue until morale improves" approach will tend to depress an already demoralised profession.

If the D.S.A can fine instructors then they can do more for the industry. I have been an A.D.I for

nineteen years now and always worked for myself, but this is getting harder and harder to do, with all the franchise instructors having to give cheap substandard lessons, then they come along to me and other independent instructors after spending a load of money and not even driving on a main road after 20 lessons. The price an instructor can charge for a lesson should have a minimum price across the board with no maximum that can be charged. My lesson price has not gone up for over 8 years just so I can keep working. □ The D.S.A should be looking at instructors been able to make a wage like they could before, as more and more instructors have to do another job just to keep their head above water.

We require expanded spot checks by police or appropriate gov dept to eliminate bogus driving instructors

Registrar already has enough powers to enforce compliance

think that being removed from the register is enough.

This sounds far too much like a "kangaroo court" process - the Registrar being prosecutor, jury and judge.

the problem with displaying adi badge in windscreen is that photograph of instructor can only be confirmed by asking to see it. therefore as long as badge is in car should be o.k.

There needs to be compliance to the register in order to improve the level of professionalism within the industry.

The registrar has enough powers as it is. there is no need to start issuing fines, that is just another way of making hard pressed ADI's pay out more money. we are private people we do not work for the DSA so we should not be fined by them

Sanctions are already available to the registrar

so long as there are systems to appeal

Don't see the point because if you don't comply by the rules you could get struck off and no ADI wants that.

Get it sorted

while greater flexibility is welcome, fines should only be imposed by a court

I believe the present system that you are taken from the register should be enough to make ADI to apply by the rules

It's just another way to raise money. If an ADI doesn't turn up for a standards check for instance without a good reason they should be at risk of losing their registration. Civil sanctions will actually dilute the current disciplinary structure and not enhance it. If the current penalties were used more then civil sanctions would be pointless anyway.

this system could be misused and would be difficult to verify infringements if reported by anonymous people

The DSA are too fond of the stick and there is never any carrot for ADI's. What right have the DSA got to interfere in other peoples business and to levy civil sanctions [fines] on ADI's.

I was surprised to hear at a recent association meeting that this hadn't been enforced as strongly as it could over the years. On a personal level, I find this suggestion unacceptable - what do the rest of us pay our registration fee's and put our selves out to attend check tests for if up to 25% of the others are getting away with not turning up? Definitely throw them off the register if they don't have a good excuse for making an agreed appointment!

When I have sanctions against the DSA when they smash up my property, you can have sanctions against me. At the moment, the DSA can do what it likes and then has the temerity to scold me.

Although this maybe a step forward to giving the system some teeth to sort out rogue instructors I wonder of the cost associated with dealing with it in this way (ie investigation and admin costs).

There are already sufficient rules covering this.

I did not fully understand what non-compliance topics would be covered by the civil sanctions so do not have an opinion

Adi's are self employed if the DSA wants more of a hold on us then lets be salaried,with pension and sick pay etc.

Well overdue

Most ADIs behaviour is not a problem and the Registrar already has powers to deal with ADIs who do not comply to the standards required.

I cannot see any evidence that the current sanctions are insufficient.

If it anit broke don't fix it

Non display of badges is wrong and allows unqualified people to risk teaching

This should be covered by the check test

There needs to be a structure to this problem

As long as mitigation is taken into consideration for some offences please dont make it a way to make up for the licence fee loss

Only those who feel they may receive a fine would be concerned

I feel more consultation is needed with professional groups i.e MSA, to get the right balance.

I do not understand why this is even a proposal.

Break the rules pay the price.

I feel the whole process works quite well as is. ADI's who take their registration seriously would not deliberately avoid following procedures. ADI's who flout their responsibilities and instruct without approval should be struck off.

Can't understand why the extra costs involved in fining ADI's would be money well spent, if an ADI can't manage their own registration then the threat of bring struck off should be enough.

keep the same system. no need for change.

To be credible, any such scheme needs to have clear and fair sanctions. The proposal seems to represent the best approach available to DSA

I agree that there should be a cost, certainly as it is a cost to the DSA to administer this.

Difficult to enforce. Registrar has sufficient powers now (to remove from register after adequate warnings issued)

sorry no idea of what your question is about

It is important that warnings are given to ADI's who fail to comply with the general rules of our job eg, failing to display their certificate to give paid tuition.

In my view, it will be better to issue written warnings, give the ADIs at least 3 chances to improve. If still fails to reach standard then can be advised to take a professional educational course to improve, rather than losing his or her/ADI badge which is all their livelihood.

You have not made it clear what the sanctions would be applied for, or what the money raised by imposing fines would be used for.

The proposal is too open and unnecessary.

The consultative groups would be nothing more than a "quango"

Chase the people that do not have any qualifications, to fine people for not displaying the badge is outrageous. Instructors who defraud learners should be taken to court by the DSA and have licences removed.

This should be taken further to include those rogue traders who are not on Register. More DSA/Police swoops on L plated vehicles are needed.

Repeated noncompliance within the ADI registration process should result in removal from the register.

I would need to know more about what type of non-compliances would be included in this proposal.

Registration rules are no good without teeth

The introduction of a fine as part of civil sanctions could be more of a deterrent to ADIs. Such transgressions would then be dealt with in line with those in other areas of the transport industry, for example breaches of operator's licences.

Money making scheme and the thin end of a very big wedge.

ADI's are sanctioned to the hilt as it is. Giving the registrar a bigger 'stick' with which to control

the ADI will do nothing but alienate and degrade the DSA/ADI relationship.

What would put you in this position, list of offences

In principle, yes, but as such sanctions could at a later stage be applicable for motorcycle instructors and ATBs, sanctions for motorcycle Instructors should also be reviewed

The pupil can often be a real victim of bad experiences on lessons

I feel the DSA should be encouraging and facilitating good practice, rather than just policing poor standards.

I believe that any enforcement of rules regulations or standards should be delivered by the DSA with consultation with other involved parties, it would be like saying to your GP that they will be struck off because they gave you the wrong tablets, any compliance should come from the governing body.

These are a good idea.

I have no real problem with giving the registrar more powers but would wish for all details of what exactly would be deemed a breach of rules before agreeing in full

In house sanctions have always worked

DSA will see to be profit making

why do Registrar need civil sanctions? ☐ There are current criminal laws to protect the both LEARNER and the INSTRUCTOR. ☐ and the ADI registration got the power to revoke the ADI badge if it become necessary.

Loss of licence should be sufficient.

Insufficient information provided in order to make a fully informed choice

Another money making scheme .there is already a redress system in place if the DSA actually had people out doing it they would find it will work. ☐ So don't change what isn't broke just do the job properly and stop looking for ways to generate more money

At one stage during my career I discovered that there was another adi using my number. His

details were refused me on the mistaken grounds of data protection..Things need to be tightened up

Unless you think the current process is flawed/doesn't work?

to pre-fine someone would breach current legislation

thought the were anyway just not followed through ?

The threat of removal from the register should be enough for the ADI to comply

Seems petty to introduce fines for failure to display adi badge as a one off. Maybe a rotting up of points then a fine may be more appropriate.

Utter nonsense give any organisation power and it will be abused by the people who enforce it. ☐I call them little Hitler's ☐We have enough laws without civil actions

Removal of an ADI from the register is enough of a sanction in itself.

Yes ... too much abuse currently

registrar already has adequate powers

No need for the dsa to enforce compliance, if we don't display our badge etc the police would prosecute us.

Present system works if more adi's removed from register when breaking rules constantly

Risk of loosing badge should be enough besides isnt it already illegal to instruct unlawfully, if thats what it means

The lack of examples given as to when this might apply greatly inhibits the discussion. There is no justification at all for the registrar to seek to fine driving instructors for lack of compliance with the ADI process. Most instructors are keen to comply and the idea that these low earners might be fined based on the decision of one person is fundamentally unjust. If there are people out there who deliberately flout the rules for some sort of gain (and I am struggling to think of circumstances in which this would apply), then warnings and the removal process are suited to deal with this.

I agree that ADI's who don't abide by law or expected workplace standards should be as culpable as others in employment.

ADI's must remain mindful that they are professional people.

That's fine if you pay compensation for ineffective administration. You are proposing charging for non-compliance of ADIs. How dare you suggest this when DSA on-line and telephone enquiries do not work to an acceptable level? ADIs cannot get an answers from the regulatory authority in a timely manner. It is now 6 weeks since my colleague sent an email to DSA requesting information about renewing his ADI licence and he is still waiting for an answer. Renewing the licence on-line does not work and telephones are not answered after mid day. Who will pay the ADI for hours of lost time trying to get the process to work?

Whilst I agree with this the fixed penalty of £200 seems quite steep. £100 would be enough of a deterrent.

If ADIs don't follow the rules - they should be fined.

Didn't really understand what was proposed, but if people don't keep up to date then that seems fair to punish them

QUESTION - HOW BIG A PROBLEM ARE ROGUE / POOR INSTRUCTORS AT PRESENT - ARE YOU MAKING A MOUNTIAN OUT OF A MOLE HILL

I have a manual and an automatic car for tuition, it is so easy to forget to change the certificate from one car to the other. If I was allowed two certificates no problem. Also a problem when using a pupil's own vehicle. I carry around a photo copy of my certificate in both cars, so I can at least show some proof I'm qualified. Maybe issuing an ID badge as well as a certificate would help. Or do the DSA just want to make more money?

This would be a good step forward subject to it being fair and linked to a clear communication package so that instructors understood what was covered.

We should have strong means of dealing with problem when they arise

Financial forfeit is not an incentive to anything. □ A nominal £200 fine is just nominal. Failing to display the licence, should not cost more than the lesson charge for that occasion. Reasons should be considered. The licence holder rarely lasts the four years of the licence, so falls off the screen regularly.

The cost of this industry at present is almost non viable adding further costs would be an insult. Do school teachers personally get fined if their school does not perform well on an OFSTED inspection?

i strongly disagree with this proposal.

Work is hard enough to come by now without the threat of financial penalties from above if we step out of line.

We must all operate within the law but this needs careful implementation!

there are already laws in place

DSA already have the powers but not using them due to lack of staff to implement.

It is very difficult to respond to this question effectively as the paper does not specify the conditions under which sanctions would be imposed

reinforce policy with the law, giving driving instructors professional status - but comply within the law. Stop cowboys trying to con public.

Is there a sliding scale of sanctions? What is considered the least 'offence', and the worst of transgressions?

I think there needs to be something available for the Registrar...I am not however convinced by what is being proposed.□I worked for many years with a Discipline Code of Conduct and I firmly believe, if you were to consider a seperate consultation on this point something could be drafted. This is not the case at present...again lack of clarity.

This will alienate ADI's and cause much resentment.

conditions of registration should be clearly set out out and transgressions subject to a fair and simple penalty system

Although I have no idea how you would plan to police this.

Sounds like a money making idea for a privatised DSA.

Remove them if they don't comply

Providing the Registrar is suitably experienced and qualified in administering the law.

There are already perfectly good systems in place when one considers the numbers of complaints against ADIs was nothing near that of EXAMINERS. Leave well alone! It is against natural justice to have a fines system imposed by a government agency, outside the judicial system. From DSA information ADI's performed 25 million lessons last year (on average) with just 3 complaints substantiated at DSA - against 1.5 million practical driving tests and 28 substantiated complaints against examiners. I believe the DSA should look to themselves first before they think about others.

Not linking the sanctions together could leave opportunity for continued poor performance and non compliance

I am interested to know how you would police this. What are you going to put in place for people that want to report an ADI for non-compliance? I have recently reported an ADI and had no response or acknowledgement of my complaint.

it is unclear how these proposals are going to be policed. it seems that the 'warning' process is yet again long winded. and for example, the suggested fine of £200 for not showing a license in the window is less than the license itself! some may feel the threat as worth the risk?

This in my opinion would be unworkable. It is my business and , within reason , run it suit myself

An example is used of failing to notify the registrar of them receiving a criminal conviction. I understood that ADIs were a notifiable profession, and therefore the registrar was notified by the courts or police. Also what about the burden of proof, I'm aware of an example where an ADI notified DSA by phone and in writing of receiving points on their licence, only to be told when they renewed their ADI registration that there was no notification on their file.

Any civil sanctions should be reinvested in road safety and not contribute towards the state revenue. This is would certainly be a positive spin on any civil sanctions that were introduced.

The consultation mentions possible monetary sanctions of £200, but from the pilot scheme you will see this is at the lower end of the possible 'fine'. Instructors would still have the option of appealing against the civil sanction to the First Tier of the Transport Tribunal as they can today, however it could have a sting in the tail. If the Registrar is given the authority to issue a civil sanction and the instructor goes to appeal and loses, then unlike today where there is no cost to the instructor, under the new scheme the instructor would have to pay for the appeal. From research this is thought to be in the region of £3860. This won't just be bad news for the driving

instructors, who face the prospect of bankruptcy if they make one mistake, they could receive a fine in the region of £3,860. It will also be bad news for people who are learning to drive because costs will have to be passed on some how and it is inevitable that costs will rise for the paying public.

I do not think civil sanction should be introduced as they may become a revenue cash cow for the DSA as the onus would be on the ADI to prove that a complaint was unfounded therefore the ADI may just accept the sanction regardless just like drivers pay parking tickets even though they may have grounds to appeal but just do not want to waste the time.

There are already perfectly good systems in place when one considers the numbers of complaints against ADIs was nothing near that of EXAMINERS. I do not believe that fines should be levied by any agency other than the courts. I do not trust DSA in this regard.

A wider range of sanctions, provided backed by transparent, publicly available guidelines and an independent appeals process would help improve standards.

Put your own house in order first. □ The existing laws are sufficient to protect members of the public. ADIs do not need private kangaroo courts.

The ADI should not be subject to a civil sanction, but ultimately removed from the register completely, after any necessary warnings or conditions. To impose a fine belittles the whole ADI industry and don't see any other profession going down this route, for example a doctor is either fit to practice, or not, with or without conditions.

If it improves the professionalism of the adi, and give the public more confidence in the driver training sector.

Adi's are supposed to be professionals it reflects badly on all of us when they do not act professionally in every way.

Civil sanctions we're driving instructors not criminals!!!! I am deeply offended by this proposal that you think so negatively about adis

as long as the process is discussed with driving organisation for the better of all

There are already perfectly good systems in place when one considers the numbers of complaints against ADIs was nothing near that of EXAMINERS. Leave well alone! It is against natural justice to have a fines system imposed by a government agency, outside the judicial system. From DSA information ADI's performed 25 million lessons last year (on average) with just 3 complaints substantiated at DSA - against 1.5 million practical driving tests and 28

substantiated complaints against examiners. I believe the DSA should look to themselves first before they think about others.

Do not feel it will be policed and so just a waste of time

Until we are advised WHAT types of sanctions and for what offences I feel that this is opening the door for the registrar to be able to take very draconian actions against ADIs who may be seen to be stepping out of line. Any major offences (such as defrauding the public, sexual misconduct) are currently covered under due legal process.

I thought the courts did that job.

However before this is introduced there are other issues which would help in current times to improve standards. I.E the introduction of mandatory CPD. I have not seen this mentioned anywhere.

It is difficult to understand why the DSA feels there is a need for this proposal. The single example quoted is failure to display a badge while giving paid instruction and the question must be asked as to why this is deemed so vital. Drivers are not required to display their driving licence at all times, just to be able to produce it to authorised persons on demand. Why should an ADI badge be any different? Although the DSA denies it this proposal seems little more than a means to raise revenue.

Why? If someone has committed an offence worthy of these sanction give them a warning, if they do it again take them off the register. The example of instructors leaving their badge out is ridiculous. I have spoken to numerous examiners about this and none of them see it happening. Where does it end? Do we get fined for not saluting examiners or having the audacity of questioning one of their crazy decisions (most examiners are very good at their jobs but the infallibility clause in their contracts causes some to make ludicrous decisions)

If an ADI is doing a good job and complying with DSA guidelines then we should have nothing to worry about. This may help to "weed" out some of the dodgy ADIs of which there are a few!!!!!!!!!!!!

I agree - many ADI's for example fail to display their badge when teaching - a warning may rectify this problem

Any sanctions need to be through a court of law

More details of examples required

Should be put into plain english

I fail to see the need for this option at all. We have a perfectly good penalty system in place. The examples given are already in law whereby a police officer can stop and issue a ticket against an ADI or PDI currently for failure to display etc. As the DSA do not have the powers to stop and "search" for the certificate at present will they be looking for this as a next step. I fundamentally disagree with this proposal.

I can understand the reasons behind this. I am sure that all Registrars would exercise due care and caution with each incident.

ADIs should be professional people who should meet all the standards check tests should be complied to and any other minimum standards

There is sufficient legislation available including criminal legislation which should be used robustly.

It is very difficult to respond to this question effectively as the paper does not specify the conditions under which sanctions would be imposed

You have got to be joking, we are not employees of the DSA

If someone persistently doesn't comply, remove them from the register.

No system can work properly without good reason to "not misbehave".

The existing position is too inflexible. It will, however, be necessary to make much clearer what is and is not acceptable or required than at present in a number of areas - including the display of the badge, used as an example in the paper

We are happy to support this proposal as it clearly gives the Registrar the additional powers needed to ensure enforcement and compliance of DSA rules.

There are already sufficient sanctions available. Again disguising ways of raising revenue

Only people who are sub standard in their abilities to instruct need worry about being fined! I think it would wake a few people up

I am in favour of this proposal and believe that it is a positive move to help raise the standards

within the industry. I am not completely current with the current procedures, but from my understanding this is an additional and more immediate opportunity to react to ADI's who fail to comply with the condition.

it will be like motorists only slowing down when passing a speed camera.

We do not believe that a civil servant from a government agency should be given the power to enforce any sort of fines on independent business people. We consider this a gross abuse of sanctions.

I think that the current system within the DSA are suitable for ADI's and imposing of fines is wrong unless it is within public laws.

If individuals / organisations can't or won't comply then sanctions must be available. However these sanction should be seen to address the illness rather than the symptom! Companies who accept ADI's onto a franchise without ensuring that they are suitable should also be vulnerable to suitable penalties.

There needs to be further clarification on what constitutes an 'offence'. With the ADI Code of Practice only being voluntary, we are unsure what offences (other than actual illegal activities) the DSA is making reference to. We agree with the proposal in principle in that it allows the Police and courts to focus their attentions on other areas of criminality whilst the DSA enforce driving instruction-related 'offences'. There needs to be much greater discussion on this point, and also on the specific sanctions imposed for particular offences.

Legislation is already in place to deal with this - Using the example given about an ADI failing to display their ADI Licence whilst teaching for money - An offence already exists so no new legislation is required. Parliament is not currently looking to create more legislation without absolute necessity and as such this is not needed. Indeed, where would any money "raised" through such sanctions be used?

Sounds like a jobs for the boys. Using bullying tactics. I would see human rights and civil rights lawyers jumping at this.

We **STRONGLY DISAGREE** with this proposal. The supporting information gives the example of repeatedly failing to display the certificate when teaching for reward. How will this be detected? There is no requirement to display this during a driving test so unless this requirement was changed it is unlikely to ever produce a civil sanction. If the new standards check is to be booked and paid for by the ADI and they fail to attend then they will by default penalise themselves. The supporting information suggests that consultative groups would be involved in determining these sanctions. How can we support a proposal to introduce something

we have yet to be consulted on?

We are aware that this is particularly contentious subject but the majority of ADIs we have consulted with have expressed the opinion that a professional instructor would not expect to be non-compliant with regulation, and would therefore have no real concern regarding sensible regulatory sanctions. We therefore agree in principle that should be measures to sanction ADIs who do not comply with regulation. **However**, we would welcome further discussion about the levels of sanction under consideration. Key areas which necessitate further discussion would be around what type of compliance failures do sanctions apply, and whether the amount of the sanction should vary according to the type of compliance failure - and when indeed sanctions should be applied - first time offences or continued flouting of regulation? In other regulated professions often ranges of sanctions are considered, with various levels of severity dependent on the nature and severity of the regulatory breach itself.

Much further discussion needs to be had therefore around the level of sanctions, and the application of them in practice i.e. who enforces the sanctions?

We **agree** with this proposal and have been pressing for this sanction for a number of years. We would welcome further discussion about the levels at which the sanctions should be set and whether the amount of the sanction should vary according to the type of compliance failure and if limited suspension should be considered as a sanction alongside a financial penalty.

Strongly disagree. We already have perfectly good systems in place when one considers the rate of complaints against ADIs was nothing near that of their own examiners. Leave well alone! It is against natural justice to have a fines system imposed by a government agency, outside the judicial system. From DSA freedom of information requests supplied ADI's performed well over 25 million lessons last year with just 3 complaints substantiated against them by the DSA - against 1.5 million practical driving tests and 28 substantiated complaints against examiners. This means that DSA examiners are 155 times more likely to have a substantiated complaint against them than a driving instructor. We are totally and completely opposed to any form of limited suspension of a driving instructor by the DSA. This would have an unfair impact on a pupil who is near to sitting a test and the financial implications for an instructor's business would be far greater than any monetary penalty.

We also question the DSA's ability to do this as they couldn't even be bothered to record the results of 817 complaints against instructors onto their system.

We consider the DSA should take a long hard look to themselves first before they think about others.

We are happy to support this proposal as it clearly gives the Registrar the additional powers needed to ensure enforcement and compliance of DSA rules.

Feedback on question 15

It is proposed that we introduce an online booking process for the standards check (paragraphs 102 - 105). How strongly do you agree or disagree with this proposal?

THE CURRENT SYSTEM IS TOO RIGID

You cannot beat the Postal System

Mostly the times given for check test not suitable

make it quick easy and cheaper to get access to the data for the ADI and for the public so they can check instructor credentials

again, allow adi to go and rehearse even more by booking test to suit their needs of a easy test time with less traffic etc

Much easier for ADI's to book at a time that is convenient for them to do it, and would save time go backwards and forwards changing the dates sent through. If ADI's then fail to attend after choosing and booking themselves they should be fined for non attendance.

No worse that the one you have presently, what if it goes "down"? Would an ADI be penalised if a standards check hadn't been booked.

The way forward.

This is the 21st century and we are used to doing everything online!

This gives much more flexibility.

This would make the whole process more manageable for the ADi as at the moment the DSA have an accusing manner when an ADi needs to change the date. We think that a period of say 3 months for an ADi to book and take a test is far more sensible.

This would benefit both DSA and the ADI.

Depends on how flexible and easy it is to access.

It will enable the ADI to ensure that they are available and if you charge separately you have a much greater chance of them turning up

About time to

Not everyone has computer access. The DSA system often goes wrong . New data systems will all ways breakdown causing more frustration and costs

An online system where I can choose the day and time would be most helpful in sourcing a pupil.

The current system is a nightmare, with instructors and students being totally at the beck and call of the DSA at dictated times that might not be convenient.

Then ADIs can select a time of day that is suitable & can avoid their pre-booked holidays.

Does that mean the DSA would contact us and ask us to arrange a check test. Sometimes there seem to be long periods for some instructors who have achieved say a grade 6 . That grade really is only valid at the time and should not cover periods say in excess of 6 years as driving keeps changing.

More option to arrange a pupil for test

Anything that can be done online is an improvement

The current system is out of date. It needs complete modernisation. Currently we receive a very "tatty" letter which is at best very unprofessional.

just excuse to charge more money

Good idea

Most ADI's like myself are too busy to attend the check tests already imposed....make it voluntary...? wouldn't work..!

It would allow the AD to choose a time best suited to them rather than the DSA

Not sure how you book your own check test?

We already do that for Part 1 to 3 so what is different?

As I have not had a check test for over 4 years I would like to have feedback on my current level of performance. If I was able to maybe pre-book the check test then this would benefit probably most ADI's

There needs to be a telephone back up option.

The current system is far too inflexible. It would be good to choose the time and place. It would also mean there would be fewer missed tests

More convenient for the customer

It would allow more flexibility to ensure a suitable learner for a more effective check test. Rather than whatever pupil can be got for that particular time slot. It would be possible for a 4 week timeslot to be advised to ADI, go online, check which pupil would be available at mutual convenient time for ADI/pupil/ examiner.

The emphasis should be passed to the ADI. Current rules say that a check test needs to have been passed during the registration period. If the ADI has to organize their own assessments, they will be in part responsible for their own registration. Plus they can book and pay for a test at will, as many as they wish

Don't assume everyone is computer literate!

you have to be able to back phone if you wish

It would be good to be able to book slots which will be essential to enable the bringing of an actual pupil. Similarly check tests up until 7pm and during the day on Saturdays would be very beneficial in this respect.

This would fall into line with other services.

Whilst I see the check test (new name Standards Check) as an inconvenience and additional and unnecessary cost to an already over stressed occupation I do see the benefit to the ADI of being able to choose the date and time for the test rather than have it imposed upon him

This is already working for theory tests, practical tests, and part 3 tests. It will work for the Standards Check too. It will be a great help to ADIs.

I use online for most things.

With the abolition of roleplay, much greater flexibility in arranging appointments is needed, e.g. to accommodate those instructors who can only work during restricted hours.

IF IT SAVES MONEY AND TIME.

This will be easier to try to select a pupil to suit the time of the check test. To avoid any other work commitments and holidays etc and also to arrange check test training etc

Booking should be like booking for a practical test, with a range of dates given whereby the ADI can select a convenient date.

Not all people have access to the Internet, and what DSA have placed on line at the moment are confusing and unclear to a lot of people

This will be much easier in terms of arranging a pupil who is happy to comply, as opposed to the current system where the date is set by DSA

At least this way people can pick and choose when they are available for check tests

as long as it has some consequences if the ADI concerned keeps letting you down

This would be much better than just being told to attend. Maybe there should be an invitation to attend before a certain date and as long as you attend in that period then you will be fine but if not there are penalties including the removal from the register similar to the current system. In this day and age with the technology we have booking our own tests should already be in place allowing for some flexibility for pre made appointments etc

What about client that have poor email reception?

Good idea and fair.

ADIs should be given a time window in which to book check test

Not fussed, everything is going online and I am fed up with it. Paper and post suits me well.
MAYbe an opt in or opt out of which you would prefer

much easier .

DSA need to keep control of this to avoid confusion and disarray.

make them turn up and take a test

Adis can make sure they have a suitable pupil who is willing to take part

I think this will enhance the opportunity for the computer savvy ADI however those not using computers should not be penalized.

Selecting a time that suits the ADI is much better within a time scale

I agree with placing the responsibility for booking with the ADI

Having been victim of a discrepancy in booking times recently this may help.

Telephone booking should also be allowed as there are still parts of the country without broadband , and computer literacy is not part of the ADI qualification.

DSA should do what it does now and tell ADIs when it wants to test them, and deal with any rearrangements thereafter.

I had the SEADI phoning me up to arrange the appointment. Whilst it was nice to hear from him, it is an admin task that can be easily fulfilled by technology.

Why not. But there needs to be controls in place. Instructors will still cancel or postpone test. Much like your part 3 - needs to be sat within 2 years of passing the part 1 test. Controls should be put in place. Instructors should require to sit check test within 3 month of due date? Perhaps every instructor should be checked tested every 2 years... Part of the consultation proposes a change to the check test assessment.

It would be more sensible to email a reminder and leave the ADI to contact within a given (reasonable time) this would save bookings and cancellations

Most things are on line, you can check your diary to make sure

It would give greater flexibility to running our business.

Does this mean ADI's can choose when they would like to take a test. If an ADI is do a test surely the DSA would inform them as such.

some ADIs maynot be able to use or access a pc

Online works for everything else very well, The current standards check booking system is well out dated.

Maybe helpful with planning for instructors

Particularly if the plan is to split the fee it would unfair to expect an ADI to be expected to have funds available for a check test that can be requested with little notice

It will depend how many spots are available.

This would create a more flexible system since we can no longer do role play.

This will help the ADI to obtain a suitable pupil for the Standards check. This is necessary now that a 'real' pupil must be used

Having the option of choosing when the test was would make the process much easier.

Agree although concerned whether some ADIs will try to ignore it to circumvent the system.

Where is the consultation about removing the role play option? If it is removed the start and finsh points for checks MUST be more flexible and not limited to a specific DTC.

I agree to being able to manage or book things online but the DSA online system regurally does not allow access easilly. There must be alternatives.

Having just changed my own due to holiday commitments it just seems an old fashioned and labour intensive way of working.

The current system is too intimidating - if it remains, the wording of the letters must be

improved.

SEND OUT BY POST

I think this would go down the same route as the Discloser and barring service check which is rubbish as you must be aware.

Being a Fleet Trainer, this is the only fair option. We could more easily find a suitable driver to train on the standards check.

ADI can only guarantee suitable students for a check test in a short time frame, due to students work commitments it is not possible to expect a pupil to be available in 4 -6 weeks time

I was unable to attend a standards check with a pupil for a number of reasons and went with the role play option, this added more pressure to me as I felt uneasy, given the option to arrange a standards check would keep it in a more relaxed enviroment

but what if you have limited on no access to the internet a back up phone in could be put in place. also the need for the dsa to contact first not leaving it to adi to remmber when the test is due

Think this is a good idea and will give ADI's more flexibility.

Don't know really, I have always carried out my check test, standards test is no different

waiting for the check test to appear can be a worrying time,booking it online means i can fit it into my schedule

much better to be able to choose the time. My first standards check is soon and only one of my pupils can make the time I have been given. Luckily she had agreed to come with me.

Would be easier to arrange a time to suit everyone

Current system is inflexible and badly administered.

should have a time scale put on it

and should be at test centre where instructor works , i have to travel 20 miles away to area without any knowledge of area in which to teach in . test centre in my area but it not used so i

find that unfair

Good idea

Keep the old system as well. If HMRC is any guide, the software does not work.

Provided it is efficient snf wroks well, however it is always nice to speak to someone on the phone.

Provided you remember that not all people are computer literate and would still prefer the existing option.

Letter makes it clear.

As role play will be removed it would be good to control the check as per a normal lesson.

This cannot be policed . Has there is some instructors out there that will not book or take any further tests...

Much easier

This would be welcomed as this should reduce the numbers of Standards Checks not attended.

I cannot see any estimates of costs of this proposal & I am not convinced of any benefits. I believe that reasons for current cancellations would not be affected by an online booking system. For example, a pupil cancels at the last minute.

Check teat times are not always convenient. The one I have been asked to attend is 08.45 and as I do not start work till 09.30 I would like to rearrange to a time that suits me and my pupils

Some elder ADIs have difficulty with computers. Please retain the telephone method.

The existing process is fine, the introduction of sanctions for non compliance would negate the need for this

Many ADIs teach in areas where they are some distance from test centres, therefore, it would be much better if check tests were carried out in the ADIs local teaching area

Good idea. Then a suitable pupil can be used and there will be then less cancellation. A booking time limit should be enforced so that ADI's can't keep moving or rebooking to avoid the test.

This would make planning much easier. Could we also choose the venue? Not necessarily a test centre?

I believe it should be an option, as there are many like myself who are not that IT literate.

The DSA is our governing body and they should take ownership of ensuring that ADIs are suitable and skilled. This is a digital age where the majority of ADIs will have an email address. Send the check test date to the ADIs email on file with a read receipt request. It's up to the ADI to keep their contact details up to date. If they don't and they miss the check test fine them!! If no email is listed then send the check test date by special delivery. If you tell all ADIs that if they don't have an email address they are liable for the special delivery charge they'll soon get themselves an email address

Could be helpful so that holiday clashes and sickness do not cause problems. A formal letter or notification to book should still exist. ADI's are very busy people if they teach full time and I admit to preferring to be notified. Online booking would be handy though, or even a preference form. I hate how everything these days is "online"

It would stop the errors of administrators booking tests at test centres they can't attend. Just send notification to book a test within a time frame or have registration suspended.

Personally would like a check test on demand, as a way to learn. Yes every 4 years, but then I may like a critique if I feel I am losing the plot in my teaching or had a bad run of Learner fails.

The cost to the public purse of the current 'waste' in the process caused by cancelled check tests must be addressed. This appears to provide a positive 'carrot' to make better use of examiner time.

It seems unfair to have to resort to role play because a student is unavailable. And I understand that the DSA and SEs don't like this option either. I have a check at 8.30am (rush hour) which has made it impossible for me to bring a pupil.

Strongly agree the time and date may not be suitable and am reluctant to ask for a different time, especially being a female with a young son and school times etc.

Very much agree with this as it would enable me to book it in when convenient to me and to fit

in with suitable pupils maybe linking into their usual times for lessons

Will remove last minute excuses or reasons and will better fit in with ADI schedule or workload. I assume that timeframes will be made available

so what !!

I have never got to register with the online system the number sent never works & my fellow instructors say the same. So we can never use it as i can not book any tests online so this is no good to me.

Would make it a lot easier and you would not feel that you have the test 'sprung' on you at short notice especially if you need to arrange a pupil to use for the check test.

Check tests are often set at inconvenient times

Currently many appointments by ADIs because they are booked by the DSA at inconvenient times for the ADI or at a test centre that the ADI does not use - both happened to me! □ Putting the ADI in charge of this process allows them to choose a convenient time (subject to pupil availability)

The world of the driving instructor is full of re-arrangements and cancellations by their clients. Changing the way the check test is booked will not change the statistics for cancelling the check tests.

A sensible and useful management of resources, hopefully reducing the costs of 'non-attendance' incidents.

I could not see a mention of how regularly this would need to be or, of cost implication

But easily accessible alternative must be actively supported, as adi's spend many hours out away from Internet access.

It would be ideal if perhaps an 8 week window was offered to ADI's for a Standards Check date. That is the notice I have been given for both of my check tests.

I think this would be much more convenient for all concerned and should cut down on the amount of admin required from DSA

Good idea means the check can be planned in advance

This is in line with how learner drivers have to book their tests. ADIs should be up to date with technology so this should not present any problems for them.

This would be better as I have a child and can make an appointment that suits me and my requirements.

Perhaps for additional Standards Checks, such as those outlined in Paragraph 103, but as such, this will only effect a small number of ADIs.

The logging on process must be made easier. Getting on to the Gateway was a nightmare.

Not all ADIs have Internet ?

It will reduce the amount of cancellations and hence costs, considerably.

I can see no benefit as we already have an option to reschedule if the date given is inconvenient.

Yes. It could be used for both cars and motorcycles

As long as there is also an offline choice as I met an ADI last week who did not have a computer

Not everyone can be available at any time for a check test, due to part-time working patterns and other (usually caring for family members) responsibilities.

Any standards check left to the instructor to book would never take place, it must ne controlled by the DSA

This is a good idea. Item 5.2 highlights the need for instructors to be given the opportunity to improve their grade if they wish.

sounds like an excellent idea

I think the current system of the dsa requesting driving instructor for check test works well. im

sure examiners would flag up any potential driving instructors that need attention.

This would be more constructive and professional in a business environment, which is what we are.

where else in life do you get told what time to attend without discussion and agreement

feel that present system works well and instructors can already request date

If the standards check does not take place because an examiner does not turn up or cancels at short notice, would DSA compensate for undue time wasting.

Good idea, reduce cancellation, more productivity on your SE, better for ADIs so they can pick the time they are available.

Very good idea, convinant for instructor and Examiner

People would leave the check till as late as possible. ADI's should be invited to first but if cancelled should have to rebook within two weeks of original date or have to give written evidence as to why they cannot attend check test date.

Adi's are reticent to do the test, why would we want to book it ourselves?

Current system is outdated and clumsy. Hit and miss at best.

works well for d tests why not for check tests

I have little confidence in the operation of online booking systems.

The current on line service is always crashing, □As an ADI for the past 12 years I have still not been allowed to look at the pupils booking system

The registrar should decide when check tests are required, not the ADI. At the moment we can ask for a check test if we require one.

I think this will give too much freedom of booking! When you send us a standards check date we should respect it as much as possible, unless it really is impossible. Self-booking will allow the 'lazies' to be lazier!

Yep. Would save a lot of organising at DSA end

It would depend on how efficient the service worked, eg would convenient times/dates always be available, or restricted somehow to suit DSA hours

This would make sense

If instructors are to be judged on their grades, they should have the facility to improve them by re-examination

the current set for the check test is waist of times because the SE themselves have no idea and trying to measure ever ones performance with the same yard stick and no relevance to individual need or style

a great idea so that we can organise our diaries and plan for the checking process

Reminders when test is due would be good

i would rather do this by post

Providing that there is no additional cost to the adi.

For flexibility.

I think this is a good idea

Not everyone has a computer or wants to communicate in this way. Forced to put card details on line ect.

Undecided. Make available for bookings but if ADI has not booked their check within 2 months of their due date(we'd need one!) then it should be allocated as is currently.

More convenient.

ADIs may need to speak to someone directly and you are taking away freedom of choice

Seems like a good idea.

When I have had Check tests sometimes the times I have received have not been ideal for me. As learners have different times of the day where they perform best so do trainers. It would also cut down on lost time for the examiners and reduce costs within the DSA.

This would be very useful indeed.

Being able to choose the. Best date and time for you is great. You can work around your lesson plans and diary

There must be an adequate back up plan. Many pdi,s tell me that they get very frustrated with the online system not working effectively for a variety of reasons.

WASTE OF TIME IF THE DSA ARE UNABLE TO KEEP APPOINTMENTS - MY LAST CHECKTEST WAS CANCELLED 3 TIMES

I work all over the UK, my last check test was in the middle of an intensive course being conducted in Aberdeen, I had to make a 700 mile round trip from Aberdeen to Leeds and back to Aberdeen, expensive in fuel and wasted time. Being able to select the check when I am working closer to home would save money and time.

We agree with this approach. However we have concerns that the new Standard Check has been announced following a trial, yet the results of the trial and the examiner guidance notes (not even in draft) have not been published.

This may help the check test been cancelled but could also allow ADI not to book so a time limit needs to be enforced with strict penalty

It is not stated, but presumably DSA will still send out an invitation, then give the ADI a timescale within which they should book their check.

Giving a date well in advance in the current format does not assist part-time instructors.

this is a very good idea

No problem as long as the overall price doesn't increase above the £300 at present.□It will be better to be able to have it at a time & Place to suit the individual, as long as it's not a long winded operation to book, like it is now to access the online feature to check available time slots for driving tests.

I would prefer to make the booking as with everything else I do so that I can achieve the best result and surely it would help dsa too!

Everything in this world is far easier with an online facility. An online booking facility would reduce the number of ADI's that say they cannot attend a check / standard test following a paper invitation. If the ADI has the facility to book it themselves online there is no excuse and also there would be less money wasted from the 'no shows' at the check / standard test appointment

Much better. It's been available for the bike instructors of some time, and should be to use to. ☐ Also why no formal qualifications or ck tests for HGV

This will help ADIs plan around work commitments

I currently have THREE unique numbers to use the DSA services, and also have to use an extremely cumbersome password (far more stringent than online or telephone banking), as a consequence I simply don't even attempt to use the existing online services. I know many other ADIs who feel the same.

The current system of Check Test booking is very poor, and is not customer focused at all.

Stops wasting time and money by DSA sending letters - if driving instructor fails to show they bear the costs. This allows ADI to plan his check test with the pupil which is needed.

not all ADI's have internet access

this would be most efficient

Doesn't affect me, as a Fleet Trainer

it would be better for adi's to choose date/time that is suitable for their diary/work schedule and availability of pupil.

This would reduce time wastage in the current system.

This is a most welcomed proposal, it is very difficult at times to arrange a suitable time for both parties, if you are to supply a pupil which i have always done, I have time to prepare a back up one just in case I am to be let down, this way, hopefully we all have a convenient time to suit.

it is now necessary as you can not speak to any one on the phone about your check test which I think is appalling. I had to write a note and hope you received it and e mailed me back. It was like communicating with a ghost

Long overdue ...

As long as sufficient time is given for ADI's to arrange this without any silly threats being implied or made

Most companies are going 'on line' for everything to cut costs, but try to make it look as if they are improving services, which rarely happens.

Its a bit worrying that you would allow someone to be responsible for their first standards check after qualifying. I believe you should book them in on passing and it is compulsory to complete within a certain time frame.

The DSA is becoming obsessed with doing everything on line. What's wrong with the instructor and DSA speaking to each other to arrange checktests?

Greater control for those ADIs that would like to undertake a more regular check of their own competence or just "had a bad day" at their previous attempt and need a high grade to maintain certain contractual obligations.

How often can one apply?

Also want it on an app for easy access.

As and adi it would be more beneficial to choose date and time to suit work load.

I would still like the option of role play to be available. As a part time ADI my pupils may not be available at suitable times.

This should make a big difference both to the ADI and the administration if correctly organised. This should be conditional; that no fee should be charged if pupil is unable to take part in the SC, i.a.w. the Registrars DIPOD interview on Standards Checks (July 2013).

I agree that the principles are a good idea but you are assuming that everyone has the internet. But 84% of people UK have used the internet but this figure does not reflect how many have internet access or desire to use the internet. Only 50% of the population use the internet on a

daily basis. As an internet company we find that many instructors are reluctant to pay for services or goods online. Are you aware of Chargeback? A PDI could, in theory, pay for their test fees online with a credit card, fail or pass their test and then request a chargeback through their credit card company. This will mean the DSA will incur a chargeback fee from the credit card company. I think it is being naive to believe that ADIs will book their first standards check once passing their exam. There will be more administration chasing up ADIs for their checks. I believe you should book an ADI's check date but give them the option of changing it online.

how will this work?□who polices this?□what if an ADI fails to request a standards check?

properly run this should reduce costs and speed up current processes. It would of course need to be user friendly.

We already have perfectly good systems in place when one considers the numbers of complaints against ADIs was nothing near that of EXAMINERS. Leave well alone! It is against natural justice to have a fines system imposed by a government agency, outside the judicial system. From DSA information ADI performed 25 million lessons last year (on average) with just 3 complaints substantiated at DSA - against 1.5 million practical driving tests and 28 substantiated complaints against examiners. We consider the DSA should look to themselves first before they think about others.

so long as we are given adequate time to book them. Out of the cancellation figures, how many were actually cancelled by ADI's, and how many by DSA ?

Completely sensible, why wasn't it done a long time ago?

Increased flexibility and more consideration for the instructor in question. - I like this idea.

Neither in favour or against but realistically we don't think the booking system would be manageable due to current Government costs savings. If they do it by the web then fine, provided the cost savings are passed on to the ADI's.

It would be ok but the option of using a phone should be considered as not everyone is computer literate or have access to the internet.

This should make a big difference both to the ADI and the administration if correctly organised. This should be conditional; that no fee should be charged if pupil is unable to take part in the SC, i.a.w. the Registrars DIPOD interview on Standards Checks (July 2013).

Any steps to reduce the inefficiency in the current system would help reduce the burden on the

industry,

Anything that can make life easier of the ADI. after all its impossible to get through by phone!

It is difficult to find the right sort of pupil at the time required. It can also affect our lives i.e working around children.

The current check test appointment is perfectly ok please no more on line booking systems!!

control at your fingers definately

This should make a big difference both to the ADI and the administration if correctly organised. This should be conditional; that no fee should be charged if pupil is unable to take part in the SC, i.a.w. the Registrars DIPOD interview on Standards Checks (July 2013).

Good idea but not suitable for all, what about the Adi that don't have access or knowledge of computers.

as long as we can select or deselect an examiner

So long as there is the ability to make telephone contact when required. The government process of transferring as much business as possible online works when everything is simple, it is when dealing with irregularities that the problems occur..

As long as an off line option (phone or post) is still available I think this is a good idea

The fixation of government departments to do everything on-line is worrying, although a change to the way in which check tests are booked is long overdue. There should also be concern that the DSA admits to currently giving three attempts for an ADI to pass a check test. □ The drop out rate, which must be the biggest expense, could be eliminated completely by changing the way in which bookings are administered. The ADI badge is valid for 4 years, if all ADI's were required to book a check test at any time during the third year the cancellation rate would be eliminated. A small additional fee could be charged if the ADI forgets and has it carried out in the fourth year and refusal to renew the licence if the check test had not been carried out would ensure compliance.

you should be more face to face i get nothing from you at all just cheque tests

There should be the option of making the booking online or by post.

Long overdue

I don't see a problem with the current system. It shouldn't be an option for an ADI not to turn up for a check test unless there is a genuine problem. The DSA should take a firmer line.

I agree it would be easier to book online

Current system works to my knowledge.

Only if non-online use is also permitted

Not sure what you mean?

If this is properly run and the system does not keep breaking down it should be an improvement. ☐ I am concerned that not everyone checks their emails every day. Will notification of a cancellation by the DSA only be given by email. If the ADI does not check for messages daily the cancellation may be missed. Will this be the DSA's fault or the ADI's fault. Will the DSA confirm receipt of information of cancellation etc by phone.

It would be better for the Examiner to be able to carry out the standards check in a location which suits the ADI

It would make it easier to book a time that suits all parties

It is the modern way forward with all business's now so why should the DSA be any different? If learner's can now book lessons on-line with instructors why shouldn't instructors book standards checks on-line too? It's called progress.

Online booking would make it easier to ensure that a learner is available on the date of the check test. ☐ When I was given a time, I did not have many pupils, and those were taking their lessons at specific times on particular days of the week. I found it very difficult to find a pupil who could actually be available at the time I was expected to attend.

I would agree with this procedure.

The current system of Check Test booking is very poor, and is not customer focused at all.

Yes, but conditional that no fee would be charged if a pupil is unable to take part in the

Standards Check

Might help I guess...but as the standards check is currently discredited, this is not a major concern.

With an increasing number of "part-timers", organising a pupil to fit in with a predetermined date can be very difficult.

The current system is little short of being rude to the instructor - it issues what amounts to a summons, and - on personal experience - attempts to make an alteration to the date are met with a requirement to provide written proof of the reason for unavailability on the date. Putting some control - and responsibility - in the hands of the instructor should make this more manageable, and improve the relationship between them and the DSA. Digital facilities are far easier to manage in the modern environment where others are digital, and confirmation by post etc is now too slow to operate amongst other commitments

We are happy to support this proposal if it allows more flexibility for ADIs to book their standards check.

About time! It's common sense

I was surprised at the current figures of cancellations and non-attendance. If an on-line booking system is deemed as a way to reduce these numbers then I fully support this measure.

being able to book, or amend the booking that the DSA made online would be much easier. you already do this for the driving tests.

the current system works perfectly well.

It would give the ADI more flexibility for organising a suitable pupil for the standards check

will make it easier to get a time and date that suits you best

Not everyone has access to or is computer literate

Makes sense in this day and age.

Some would miss their notifications in the general mass of on line mail, spam, junk mail etc. Plus many have multiple email addresses.

This is definitely a positive action, allowing ADIs to choose the test centre, time and date of their Standards Check to suit their normal working hours and location. We are looking forward to receiving clarification on the duration between Standards Checks (and whether this will be based on the new grade restructuring) and whether ADIs will have to book (and pass) their Standards Check by a specified date.

Sounds expensive. What is the overall costs.

We **STRONGLY AGREE** with this proposal and have been asking for an online booking process for the check test for a number of years. We anticipate a lower percentage of ADIs who fail to turn up which would reduce the need for civil sanctions and also the cost of administration. This more efficient cost saving system should then produce a reduction in the cost of ADI registration and the standards check.

We strongly agree that this would be a sensible and efficient measure.

We **agree** with this proposal and have been pressing for an online booking process for the check test for a number of years.

Strongly agree. This should make a big difference both to the ADI and the administration if correctly organised. This should be conditional; that no fee to be charged if pupil is unable to take part in the SC, in accordance with statements made by the Registrar in the DIPOD interview on Standards Checks (July 2013).

We are happy to support this proposal if it allows more flexibility for ADIs to book their standards check.

Feedback on question 16

It is proposed that we restructure the registration fee so that the standards check is paid for separately at the time of booking (paragraphs 102 - 105). How strongly do you agree or disagree with this proposal?

I feel the costs paid now should remain

THIS IS THE ONLY PROFESSION WHERE A FAIL RESULTS IN LOSS OF LICENCE, MOST PROFESSION'S IF YOU DO NOT COME UP TO STANDARD YOU ARE RETRAINED, WHY DOES THE DSA NOT DO THE SAME.

If this happens, the Registration fee should fall dramatically, as the check test is by far the biggest item an ADI gets from being on the Register.

restructuring doesn't necessarily mean higher fees and a better streamlined system will hopefully save money so rates can be at least maintained

why ? cleaver way to up the charges like when crb checks came in. no charge was stated and then up from £200 to £300 in one go

I will agree if it was taken into account in the fee charge for my ADI badge and Fleet badge.

Another cash cowl for the DSA. My ££££s have gained me a badge, nothing more over the last four years. It doesn't cost that much.

I'm now assuming by the wording above that the standards check fee will be in addition to the usual fees ?

Better than the existing arrangement.

I would like to see ADI's able to request a standards check if, for example, they want to increase their grade, following further training, without having to wait until their next time comes around. Being able to pay for this gives the ADI the choice.

This would allow you to increase the cost of both tests and so charge more than if you were increasing just 1 fee.

I think this would work but only if the registration fee is greatly reduced.

will it make a difference

This is just an income raising exercise. The DSA already makes a massive profit, or surplus, from the ADI system. There is no justification for this suggestion

The fee paid for ADI registration should cover it.

We all know this means a price rise! I cannot see the registration fee being reduced to compensate for any fee due for the 'Standards Check.'

See above. This will undoubtedly lead to increased cost for instructors and increased administration and bureaucracy.

Some ADI's will not comply

Depends on costs. Will it cost more or less? ☐ Better still abolish the standards check altogether

I dont have a problem with this as I always attend check tests and have only taken one for each period.

As long as the overall cost remains approximately the same.

I also think that the Standards Check should be an annual assessment.

again another cost dumped on adis when dsa want to raise more money

However I would not be satisfied that the present £300 fee remain and there should be a defined reduction to the 4 year registration fee -- AND -- the standards check test fee is realistic. I understand the frustration of DSA regarding uncompleted/rearranged STs. However I would like to see a suggested path/communication prior to a STs being required to be taken -- something that DSA must redress/suggest a format i.e. 6 months and then 3 months reminders -- pointing the ADI to the online booking system.

Why should I have to pay for your test?? You want to test me then you pay for it.

As long as the ADIs that have paid the full rate are not penalised.

I wonder, will it cost more or less than at present?

As long as this is not used as a method to increase our fees

What do we get for the badge fee already?

providing it does not just become an EXTRA cost ie. the registration fee should reduce to compensate for the introduction of standards check fee

If it brings the overall cost down for competent ADIs then fine, if we all end up paying more then not.

We pay enough for our licenses, and the check test is included in the fees. If more tests are being taken then why not pay for the extra tests.

At present the cost of 'green badge' is all inclusive, so as far as ADI concerned the 'check test' is a administrative problem, rather than an additional financial problem.

Provided taking a maximum of 2 check tests during the registration period doesn't cost any more than the current arrangement.

So long as the cost to the ADI does not increase as a result.

As long as this reflects in a reduction in renewal fee of current adi & fleet licence. so that overall cost is same

You already take £300 for very little work. It is the DSA's responsibility to maintain standards, that is what they already have a government funded budget to do, so the test costs should already be part of the DSA cost base.

Care should be taken to phase such a fee in. Existing certificate holders have already paid the full fee and should therefore already paid for the test.

I agree from the stand point that I am a Grade 6 instructor and therefore would have less check tests that a Grade 4 ADI. However, it would be vital for the DSA to be fair in its grading of ADI's if this new system was to be introduced i.e. examiners should not 'mark down' in order to create

more revenue in the long term for the DSA!

we pay enough through taxes and other motoring costs

Looks like a way to take more money for fees. But could be better for the ADI's who don't turn up so that they lose the fee and could discourage this type of behavior.

As long as the current registration fee is reduced to take account of this

I believe that this will lead to fear of instructors being given lower grades in order to encourage the test to be taken again. In order to ensure that fairness is applied throughout the test, there must be no financial incentive for any organisation to give a lower grade than the candidate actually achieved. As this test is subjective and many points can be debated, it would lead to mistrust of the result. For the record, my last check test was graded as a 5.

I already pay (1) ADI licence (2) Fleet (3) ORDIT, A "one renewal fee" covers all at a discount, then perhaps a "check test fee" might be viable. Instructors are in the trade to make a living

I think that needs to be set out clearly and a true break down of cost published

Fee should be left alone. one collection of monies.

This will really 'pollute' the process of Checks if getting a "Grade 4" results in having to pay for another Check.

Ok, so now there's £120 riding on the outcome. Ok, so I will rehearse my "Check Test". I will select my "client" with care. I will plan the route in great detail. I will do a lengthy brief/objective setting and a long review. I will use lots of cool instructor tricks (think of a number) to make me look good. No, it won't be a "normal" lesson.

And if the SE dares to give me a lower grade I WILL argue the toss with him, cos that's my money you're trying to take away!!! B'stard!!!!

So, I will definitely not give them a "normal lesson". I will put on a rehearsed performance and the relationship between the SE and me is now potentially confrontational and not developmental. Not a good move to help raise standards then!

If a lower grade has to result in more checks, then keep the finances as they are, or there will be trouble at mill. I can't see that there needs to be more frequent checks on grade 4 than 6 - is there any evidence to show that this raises standards? I can understand shades of 'unsatisfactory' - "improvement needed"; "wow, fairly dodgy"; or "get this guy off the streets now!" - but why do we need to have shades of satisfactory? Let the market decide on who they want to do business with. Again, where is the evidence that a Grade 6 is actually a "better" instructor in reality?

So, revamping the system. Good. Let's move away from the current "one true way - pt 3 approach" and become more realistic and flexible. Keep it to checking the minimum standards have been met - was it safe, was it correct (legal & mechanical), and was there potential for effective learning - and leave it at that. Don't change the finances, don't worry about grades of 'success', and don't impose a new "one true way" which we're supposed to rehearse and demo.

The current proposals are too "academic" and with far too many areas, terms, etc that are entirely open to interpretation. I'm not convinced the DSA can "train" SEs effectively to make judgements across the board on these non-specific concepts.

Provided that you reduce the ridiculously high fees for registration every 4 years to compensate as overall it looks like this is a thinly veiled disguise to fleece ADI's yet again (As the fleet badge does!!)

I would expect this to cost more overall.

It will seem like a good way to hike prices if it is separated from the registration fee.

as long as that price remains the same ...or costing is put into the qualification process

Why should i have to pay for a check that is imposed on me?

I don't believe that instructors should have to pay for this check test.

I do not understand what my fee pays for except my check test so yes I would like to pay for that separately and also know what the remainder if the registration fee pays for

On the basis that most instructors are grade 4, you are just out to make more money

unless there is a maximum payment up to £300 in any four years. if most ADIs pay less and none pay more then it would be fair

I feel we should keep the registration as simple as possible lets cut down on red tape and with having to fill in different form keep it simple

The fee at present is acceptable.

ADI registration fee should be reduced to reflect this and this should not be taken as an opportunity to profiteer

Agree providing costs remain in line with today's costs

I think £300 is fair now for four years anyway but maybe that should only give you 1 check test so if your a grade 4 (needing 2 check tests in 4 years) you need to pay for the 2nd one your self. This makes it worth while getting as grade 5 or 6 where as now it makes no difference so a grade 4 is no problem for any ADI

why should we pay for what is neccesary ?

That would allow each fee to creep up making the over all cost expensive for the Instructor.

make them pay the true cost of any test not subsidised by the public

Being a Grade 6, the fee should be less...

The registration fee should encompass all costs on a one off basis.

I feel its a money making gimmick. If you are called up more often... more costs... more pressure to do well. Therefor more mistakes

This looks like a way to make more money. It should be a requirement of the DSA to provide standards checks. Should they be fined for not doing so as happened in the past when many

ADIs went for many years without a test.?

Proving the initial registration fee is reduced to show this separate payment

A single payment is far easier. In any case, I disagree with a "booking system" for check tests in the previous question, so this is moot.

There needs to be a choice

This would greatly depend on cost

Question: Does this proposal cover the fact that the Check Test is included in our registration fee at present, and would it mean a Decrease in the Registration Fee? It would appear that there would be an incentive for Fails, i.e. Low categories, to encourage MORE standards checks would be undertaken...???

Depends on how the cost of a SC would go up yr by yr.

Yes, it is a sensible change. Pay for the test as and when. Some ADI's may wish to improve their grading before their next mandatory check test date. It should be a common right that an ADI can pay for a check test at anytime.

Registration fee is paid every two year. This should include one check test. If the ADI is unsuccessful - he pays for subsequent check test. Again strict timescales should be in place for retesting. As stated in the consultation instructors are prone to cancelling..

As long as this is not used by DSA just to increase revenues.

Before we know it registration will be back up to £300 and we will be paying for Check Tests in addition. A little like our Council charging separately to empty our garden bin.

Principle is fine - the reality isn't

How much are we to pay for our badge renewal

Yes, I believe this is good.

The registration fee was increased to include the cost of the criminal records checks. I understand that those cost no longer apply but the registration fee remains the same. So the

cost of the registration fee will go down to include the cost of 1 standards check every 4 years, but what happens when more than 1 is required, is this an incentive to do better or just another money making scheme.

pay for what you receive, and if you require more or other standard tests then you require to pay more.

Some of us are not earning mega money and we have to budget from one month to the next, a fee that is included in the renewal of the licence allows us to budget approx 3-4 years ahead. A legal standards check that comes with a months notice and a fee of £90 would be difficult to suddenly find, especially as the notice can come out of the blue. I wouldn't be able to just come up with that money, knowing that it is paid as part of my licence fee is comforting and enables me to budget more effectively.

the problem with paying for check tests separately is that it could be seen as a money maker for the DSA as examiners could fail you, forcing you to pay for an extra test, its also been said in test centre's that as there is a drop in part 2 and part 3 work examiners could fail you to keep there workload high

If this would see a reduction in the cost of registration

This will allow an ADI to request a further check, if they are not satisfied with result of standards check

Not sure what gain we see in this? I am happy that my fee includes my standards check, and am not keen to have to pay that separately.

So long as the TOTAL cost does not rise as a result - inadvertently or by design

As long as this is not abused and merely used to charge more for services in an industry already reeling from the constraints placed upon it by the current economic climate

This is likely to lead to instructors being downgraded, meaning they have to take the standards check more frequently, and so generating more revenue for the DSA

Only If an ADI has to sit more than one Test because of failure or a more regular check Test because of fleet training or similar.

Your charges are too high....so by making a change would be in my mind REDUCING THE CHARGE NOT INCREASING

This would split the burden of having to make a one off large payment.

I hope this does not lead to higher fees in total

What is the point of doing this when your check test falls around the same time as badge renewal? Surely it just complicates matters. A better idea would be to pay a set fee every year or every other year to ease the financial burden. £300 is a lot to find in one go.

Easier to budget if the amount to be paid is known

WE KNOW WHAT WOULD HAPPEN THE COST WOULD KEEP INCREASING AND BECOME UNREALISTIC

Depends on how the split is going to be made

Agree although it may create even more negativity around the standards check if they have to pay directly for it.

Of course this depends on how the fee structure is broken down.

It is rumoured that all ADI's will be downgraded so to increase the number of standards check taken in order to increase payments to the DSA.

Good idea, but don't make it too expensive!

this depends on the cost, if the DSA intend to increase the overall registration fee then it is a bad idea given the climate.

This will mean better instructors pay less in the long run

This should be included in the fee for the Badge.

It's a worrying enough time anyway. To have to come up with the money to pay for it then too is an awful proposal.

STAY AS IT IS

As long as the existing fee of £300 is not exceeded within a 4 year period. (Assuming 1 check

test every 4 years.)

I think this will create more admin therefore in time the cost will be past on to the ADI

As long as in exceptional circumstances for non attendance the fee is not lost this would be unfair

If there is a perception that an ADI is paying directly for the Standards Check then it is likely that there will be fewer cancellations or no-shows.

The regulatory authority should not benefit from its own activities. This is open to abuse/misuse.

Cost is spread out, very fair.

the (standards check) /check test should be part of the licence fee as it is now.

This is a good proposal - IF the ADI registration fee ☐ is reduced by a similar amount.

It would be interesting to know how this would work as we have to re-new our licence every 4 years but currently check tests can be anytime ranging from every 12 months up to 8-9 years in some cases. Great idea but not sure how you would split cost??

I agree with this but it would depend on the proposed cost of a standards check.

Total fees for ADI / check test must be published before an agreement can be made.

Only if it means that the combined cost is the same (or very similar) to the present cost

The fee is far too high.

What is our licence fee for then?

As long as the costs are comparable with the current fee

What happens if you need more than one standards check. Paying more out.

This must not be used as an opportunity to increase the cost. the cost of registration plus the

cost for the current average number of check test an adi undertakes in a four year period must not exceed the current cost.

If the registration fee is there to cover the cost of standard/check test, only fair that a Grade 4 pays for his more tests than a Grade 6

Why complicate a system that works

we already pay for our 'check test' via the registration fee why would it become different because it changes its format

jeeze...how much do you think we earn out here!

This should be covered under our ADI licence fee - there is absolutely no need to pay extra

I feel this would push the cost of registration higher and unaffordable for most ADI's

In the last four years I have had one check test yet know of several ADIs who have had several check test within the same period, so why should my registration fee pay for their incompetence

Only agree providing that it costs the ADI no more than the present fee

There are no numbers. Will this end up costing more or less? Also, if check tests are charged for, there is less incentive to aim for continuous improvement.

if the cost is the same or less overall as the is less staff need for online issues.

I do agree with this for the reasons laid out. It seems only fair that someone who needs more checks pays more than someone that does not.

Just another level of paperwork.

One payment keeps it simple.

Again no firm opinion as there are unanswered questions, e.g. What happens with those of us who have already paid the 4 years registration fee and still have some years to run, for example the new standards check is to be introduced in April 2012 but an ADI still has 2 years to run on the registration fee? Would we be charged again for the standards check as currently the check

test fee is built into the registration fee?

As long as the fee for a standards check is reasonable in line with normal driving test fees.

Other professional organisations do not have to pay to be on a registrar . So this as always been a bug bear. If any thing the fee should be split over a period of time.

adi's may well be paying out even more than the registration fee

I would like to see some figures before I am prepared to agree to this proposal. For example, how much will the check test cost? Would there be a cost if late cancellation was unavoidable? By how much would the licence cost be reduced? There is insufficient information available to agree to this proposal.

No quantitative figures supplied, although I do agree in principle if as an ADI my costs do not increase for 1 check test

If the standards check is conducted fairly, by former ADIs, who understand the process of education from an educators perspective, then I can see little problem with this. If the check tests are conducted by DSA representatives with no experience of teaching, and only of 'assessing' then I worry that the results of the check tests will continue to be perceived as 'of little value' and that therefore resentment will result in having to pay for 'another check test'.

Money better in my bank

Keeping it, as is, helps ADI's budget

This would depend on cost. How much would a standards check be? We already pay £300 every 4 years. A big dent in profits of a sole trader.

As long as the cost does not over burden the instructors

Only the initial check test should be paid for...if an additional check test is required within a 4 year period, this should not be charged

Need to know the cost for check tests and the licence and indeed any other costs which is currently covered by the licence fee.

Because in time it will be increased back to where it is now plus the additional charge for the

test. Therefore being way above what we pay now. It will also have a higher cost to the DSA in admin and then costs have to rise further.

Instructors who fail the standards check test should be required to pay to retake the test.

Yes, this makes the fee more fit for purpose in my mind. More accountable.

That is fine ONLY if the licence fee is drastically reduced to compensate for the check test fee, but will that happen ?

It's easier to budget if your registration costs cover the standards check. No more bills please!

If it is not broken don't fix it.

Provided the registration fee reduction realistically covers the potential costs of the standards checks and doesn't become an extra cost and a means to make more money out of ADIs

Having just reregistered at a cost of £300 will I be refunded if I have to pay for a check test which at the moment seems to be all the DSA do for the fee

We have no view on this specific proposal.

I do not like having to pay out a substantial lump sum for the registration fee. It should be staggered in some way and this proposal helps.

Agree that if someone has more than one check test for what ever reason and costing the DSA money. It gives more incentive to ADI's to ensure they are up to standard. Also if you have a bad day on your check test, you can pay for an additional test later to improve your grade.

This would again be beneficial to me as a sole trader avoiding large outlay and spreading the costs

So what !!

the better the grade the less you pay common sense really

We pay enough already

As long as over-all ADIs do not pay more! Do not use any changes as an excuse to increase costs.

I agree with reducing the registration fee and making the standards check a separate payment and then if you are a highly graded ADI you are awarded for the small percentage of time we use the senior examiners.

It is easy for an ADI to budget for a £300 fixed fee every 4 years. It would not be easy to budget for an unknown number of standards checks at unknown times.

1 payment wraps it up. 2 payments is more admin time, and time = money.

I and many other people do not have a debit or credit card and do not wish to expose themselves to on line fraud.

As long as the standards check fee is a constant.

OK as it is

I think this is a very good idea, helps to spread the cost burden of registration.

As long as the cost doesn't increase for ADI's who need only the one standards check. The increased costs ought to be borne by those needing increased (remedial) standards checks.

It would be an excuse to increase both hiding the true rises.

This means that the costs for additional check tests (for reasons of failure or to improve grade) are borne by the ADI and fully recouped.

I already have to pay for my licence so the fee for this should include the fee for the standards test.

agree if it costs the same or less, not more, already expensive

High risk of increased costs

This would have an adverse effect on an ADI who was to grade 1-3 and have to take an additional Standards Check in order to obtain a sufficient grade, assuming that the current

system is retained.

The cost of training, expenses, licence fees etc is more than enough money for an ADI to pay I beleive

This will probably get rid of those that do it for beer money but for those that have renewed at the full price, then provisions must be made for them.

Only if the split cost does not increase the original registration fee. I.e more than £300

Regardless, the registration fee is extortionate. How it is paid is of secondary concern. Costs to the ADI are currently sky high. The registration cost should be reduced.

I agree provided that the fee is fairly divided and doesn't mean a huge increase in registration costs.

Make it payable in instalments over two years

As long as charges are not increased . Although costs would rise for a lower grade, it would be an incentive to improve but as expenses are large enough anyway it may just point good adi's away from the industry.

Yes. The proposal seems fair and will reduce cancellations and save money. 'User pays' is a more fair system that should be applied to both car and motorcycle

It will inevitably push up the price

Look at ideas on question 11

This may be perceived as an opportunity to award lower grades in order to generate additional revenue from instructors retaking the test to better their result.

good idea for instructors not the DSA

so long as this does not meen an increase in fees by the back door it sounds a good idea

The adi green badge should cost less if we have to pay for the checks.

this should be incorporated into licence as is current.

As long as this is not taken as an opportunity to raise costs.

The frequency or need for check tests if to be a frequent occurrence should be on a clear and transparent criterion and evidential basis.

Provided the general ADI registration fee is significantly reduced & the cost of the 'standards test' ought to compare with the rate an ADI charges for a lesson. Fail to see any justification for an examiner to earn a higher hourly rate than an ADI. Particularly when many 'supervising examiners' have had little experience of the 'real world' of giving driving tuition to mixed abilities.

registration fee should include check test costs. seems like a money saving project with no benefit to an ADI or the public.

Providing reg fee + 2 standards check = £300 I can not see DSA is thinking the same. If I have nothing to gain but plenty to lose, NO. DSA will see to be profit making

ONE Payment helps keeping to the budget for the ADI's

If fees are split then instructors would think that if marked down is just another way for DSA to make more money out of instructors to get a better grade by paying for another test.

No no no. I can see no reason that this would benefit adi's.

Why should ADIs who display higher performance subsidise those who don't or can't be bothered to develop or think they don't need to.

The fees for ADIs are already to high for what we get so this should be scrapped

As long as the licence fee is reduced. So that ADI's that are grade 4 pay more, give an incentive to improve.

I think if you have a registration fee then this should cover the cost of check tests.

Reduce the registration fee and this would be acceptable

One fee is fine, why make life difficult and costly for the agency as you will have x2 the admin

costs or more.

Is this just another way to increase costs?

All inclusive is great, but it is a shame that the whole cost is so expensive, especially as mine falls around Christmas time! Ha!

Separates the costing better for business planning

As long as the Registration fee is structured properly & not trying to make extra money from working ADIs then this would be acceptable

My guess is you'll still charge too much to be on the register for simple administration, and the fee for the standards check would be many times any ADIs hourly rate!

without knowing figures it's hard to judge

Again sensible

On the basis that the registration fee is reduced by the same amount

As long as the fee charged for the standard check is removed from the current ADI registration fee.

ADI should be allow to choose the SE, because that will soon isolate poor SE, what has DSA to fear about?

Feel the fee should be able to be paid annually or even monthly by direct debit, this would be better for adi's who may be starting out or planning to retire

Standards check should be included in Registration fee.

If you want us to be checked you PAY. ☐ Are you also going to charge the driving examiners to be checked?

This should not be used as an opportunity to increase fees via the back door. With further slight increases to both the register fees then again with standards check fees.

What happens if you have just renewed your green badge as I have recently done, and then I get a new standards check next April

this depends on how the 4 yearly charge is adjusted. I renewed my licence in February ... will i then be charged for a check test within that 4 year period.

As long as this is not solely to allow overall cost to rise

as long as this does not lead to an overall increase in the fee

The fee for the standards check should remain within the registration fee as in currently the case

I agree providing that there is no additional cost.

As long as the total fee cost doesn't exceed the existing costs.

Again a good idea

This will place additional cost on those ADIs who may have to have undergo more frequent check tests

How will this cost compare to a Part 3 ? ☐ Both are one hour duration.

I'm happy to pay all at once. I Don't want the overall fee to be raised and can see it happening. Also feel this is a way to fail ADIs making them pay for another test! As with our students this will not breed confidence in the people you have excepted (through our training/checks) to train your nation on the roads! If an ADI fails they should be re-tested but not charged again.

As long as such cost is taken into account against registration fees.

Charging for a standards check will put up an additional barrier for those who see check tests/standards check as a burden on their activities as an ADI.

Another con. ADIs will ultimately pay more however you word the proposals

It would help to reduce the overheads on individual ADIs.

I am in favour as it would encourage ADIs to seek to improve their grade rather than 'just tick over'.

It is easier to plan 1 payment to cover all legal requirements to stay on Register

This system works and its set so you don't have to pay extra for more 'standards check' if you don't meet. The required standard.

As far as i can see, if you are qualified, then why still require a standards check? It is not as if a fully qualified driver gets tested every so often on the road, so why does a fully qualified ADI have to?

THIS IS JUST A MEANS TO INCREASE FEES IN A PRIVITISATION SCHEME

This would depend on the costs involved, a reduction in the certificate fee of £50 and then a cost of the check set at £100 allows the DSA to make money. If the certificate was reduced by £200 and the check set at £100, this would be better for the instructor.

Whilst the principle of the 'user pays' is to be applauded this approach could lead to a perception or allegations that the examiners decision has been influenced by factors other than the quality of the training observed. Given that there is already a concern about the consistency of examiner assessments and little evidence of a robust quality assurance regime we cannot support this proposal. Given that we have reservations about continuing a grading system we do not see the need for additional standards checks, other than for those who have failed to reach the desired standard.

The combined cost should in effect not grossly exceed the current cost of ADI registration

do see how this will make much difference

It must be clear that the reduction in the licence fee equals or exceeds the price of the check. Currently we are all subsidising those who need more than one check, so the reduction in licence fee should be more than the check cost. This will save us if we achieve well on the standards check, but cost those who need to retake it. this will be fairer.

The fee for our license is already a burden on a lot of driving instructors so adding another cost to our business is going to make a lot of good instructors leave the profession

It cost enough now with no support from the DSA the initial cost should take check tests into

consideration.

Very good idea.

I would like to see a full costing explanation for £300 for a plastic covered card and a check test for 1 hour all recorded on a database being justified at £300.

It would spread the cost.

See Q15. Ok as long as the overall price doesn't exceed the current fee of £300.00, & isn't a back door way to increase prices for the ADI.

There is probably no real benefit either way; other than those who take more tests pay more - however would this still be the case with the new standard tests? It would also assist some ADI's with spreading their outgoings a little

It would have been more helpful to have given some figures. Would this mean a reduction in cost when the badge needs to be renewed?

why

Please keep current system

If paid for separately I feel there will be a raise in fee's, I really don't want this to happen.

If it is still costing the same fee then I am in favour to reduce initial outlay of cost but if it will cost more then definitely not, ADI badge fee is already expensive.

need more time to reflect cost implications.

only if we can book as many check tests as we are happy to pay for, if we have a bad day and get a lower grade than we are pleased with we should be able to re book say after a month so as to try again for a better grade

If ADIs have to pay separately many will delay or even try to avoid taking the check test.

agree as long as the registration fee is reduced, other wise it will just be seen as a money making exercise.

The cost of the standards check must be proportionate and not be used as a way of generating additional profit for the government agency

make sense

It would be ok if the total costs do not exceed the registration fee paid at present.

This should be covered in the ADI licence fee

you might have people book their check test but then not pay and this will be counter productive, also if people pay by cheque, this is costly and if they bounce, more time will be needed to chase repayments

If the fee is included in the registration price, the check has been paid for, no dispute. It also reduces administration to have one process.

However will depend on fees set i.e. current fee = new reg fee plus 2 standard checks in the reg period for example?

statistically the majority of ADIs get a low grade on their first check test so making them pay each time produces more money for government because they would not want to keep a low grade. It is better that first test is included in registration fee.

This would give all ADIs' an incentive to improve their standards, particularly if longer periods between tests were allowed for ADIs' with higher grades.

Providing the costs do not intend to be increased, then I think this will be beneficial, and we know exactly how much you are charging for registration and check tests. Should you require more then this would hopefully improve on the standards of the Driving Instructor.

If you break down costs they will be controlled by separate depts. and will eventually all increase individually and then as an ADI we then have more dates to remember and more single bills to pay. 1 fee every 4 years is great to process

It is what you are not saying that worries me about this proposal and is one other reason why your financial forecast fails. I have no objection in paying for a 'standards check' for example, if I was not at a satisfactory level or standard I would personally want to do something about that and be re-tested, hence I would be willing to pay for that privilege... I know many who will not. However, I do fear that the whilst you may reduce the registration fee I doubt you would do so by much and yet, the charge for the standards check is likely to be too high which would have a

detrimental effect.

As long as it does not cost us more for both items...!!

Why? All that will happen within a few years is that both fees will rise disproportionately.

should simply be brought into line with standard cancellation periods

Driving instructors - qualified or not are skint!!! the price needs to be kept down and you need to be totally transparent with any future costs they are going to incur.

Great opportunity for instructors to be failed on their checktest to create income for the DSA.

I believe that SC should be available on demand, however, historically the DSA suggest they don't know costs of individual elements in the licence fee, yet they have been provided, (in writing). This should not be used as an opportunity to increase fees - elements need to be correctly priced. We understand car testing has earned a £1 million surplus, yet bike tests lost £12 million over first four years with car drivers paying for this loss. This is unacceptable, as car drivers are being victimised!

depends on the cost and if it is considered a considerable layout for a newly qualified ADI who is building up a business. also the expense needed to pay for one or even two retests within a short period of time if an ADI fails. at least currently this is something that is 'swallowed up' in the initial fee to register - although, not strongly against this

So long as the cost of the standards check is mirrored by a drop in the registration fee. meaning that we don't get a £50 drop in the registration, and a price of £120 for the standards check

Having separate fees means that there is more potential in the future for fees to be pushed up artificially high. □ Without questioning the integrity of DSA, having a separate fee for each standards check leaves the DSA open to the accusation of failing people to collect more fees. □ Average it out the way the current system does.

In theory, those instructors who perform better are less likely to have to attend as many standards tests during their registration. Again, another positive reward for good performing ADI's. However, my only concern would be that the frequency of the standards tests does not increase for all without justification.

Unite have previously wrote FOI requests to see how the £300 registration fee is split/broken down. However we are still waiting an explanation. So until that happens it is hard to give an

accurate answer to this question.

The registration may need to be changed £300 over 4 years is quiet reasonable (still prefer if it was less) but the danger when you restructure is that it will become a lot more expensive and also could be a cash cow for DSA in that the result of the SC may be very negative for the ADI therefore having to have another test at cost to get a better result.

The results of the assessments carried out currently are often controversial without adding another element into the mix. Allegations of awarding a lower grade/assessing as sub-standard will likely be met with allegations that it was to raise revenue - an increased pressure for examiners.

By making the payment separate, this would make the ADI more aware that the standards check test needs to be taken seriously, if an ADI has to take the test every two years then they should pay for every standard check. not just for the one that they pay for with the registration fee

It would be more helpful. I find it a very big struggle to pay out £300 in one lump. It would also be nice to know exactly how much we are paying and for what. The people who have to have more check tests pay for them!

You'll just charge us extra for re registration and then more for a check test ... This industry has been hit harder than most and this is a back door way 2 increase fees for adi s !

again if this price is deducted from the green badge why not

as long as it cost no more than we currently pay

However for fairness the price of the green badge MUST be seen to be reduced by EXACTLY the same amount as the price of the new standards check.

I am in favour of a separate charge for the standards check, as long as the cost of initial and renewed registration is reduced

If the standards check is separate it could be seen as a commercial opportunity by any regulatory body charged with undertaking the check.

It is difficult to believe that the current income does not adequately cover the costs involved, although ADI's who need second or even third attempts should be required to pay a minimal charge, similar to a driving test fee, for the additional attempts. Separating the charges would

inevitably lead to increased fees and be viewed by the majority of ADI's as a cynical move to increase revenue.

To charge a [£50?] Registration Fee and then have the individual ADI pay for as many CTs/Standards Checks as they need [and indeed may WANT - in order to improve on their scoring] seems eminently sensible.

Of course, there will be those ADIs who will moan that there is now a vested interest in DSA's awarding low scores; this would manifestly fly in the face of the evidence, though.

- The excellence of the few top ADIs that there are has always been recognised by the sagacious team of SEs/DTAMs.
- There's been a considerable rise in the percentage of Grade 5 ADIs over the last two years so nobody can accuse the SEs/DTAMs of holding back their rewarding of 'Good' ADIs.

Any moaning is bound to be on the part of the mediocre ADIs : it's just a shame that there are so many more than the combined total of 'Good' and 'Very Good' ones.

i am seen every 4 years and pay the same as an adi who is seen every 1 year

I do not believe that the cost of the "green badge" will be reduced in line with the increased cost of paying for the standards check. Therefore this will pass more costs onto the ADI.

Yes if the reduction in costs for registration reflects the standards check being withdrawn but I very much doubt it would. Leave it alone!

I am high grade instructor and cannot book another check test although I want to to get my grade from 5 to 6 - I often wait 4-6 years for a check test BUT I pay the same as other ADI's - one I recently trained had 3 Check tests in one year as he failed twice and was seen again 8 months later - this is hardly fair or economic - If a £100 a check test was applied plus £100 registration fee this would be fairer and the DSA could recoup money when the ADI sat several check tests

Should be free

You have to be honest with this. When CRB check was introduced, the ADI registration fees went up by £100. (from 200 to 300). The CRB does NOT cost £100.00. This is plain robbery from a government agency. If a standards check is to paid separately then the cost of this

should reflect in the reduction of the ADI registration fee.

Less cost effective for the DSA therefore that will involve the costs being passed on to ADI

As above. Current system works.

So long as the overall fee isn't more than at present.

I agree as long as the cost, overall, do not exceed the current licence fee cost

Only If grades 6 and 5 or future equivalent gain with cost neutral for grade 4s and additional costs for those who grade lower. □ Stop subsidising poor instructors with good instructors fees

In the long term increases in both will no doubt mean that ADIs will end up paying more for 2 fees than the current single fee

I see no need at all for this. At present we are led to believe the registration fee includes the cost of one CT in each four year period. □ Why not charge an additional fee for ADIs who need an additional test (or multiples), this way ADIs who only need the one statutory test during the licence period do not subsidise others who need additional tests?

Is the fee going to be reduced for our licence to reflect the standards fee

Personally I feel that the registration fee should be paid annually and the check test should be included as part of this fee. A quarter of the overall cost included in an annual subscription.

Past observation is that any fee which is split suddenly becomes two charges which add up to considerably more than the original single charge. The justification for this is usually that each charge has to have a separate administration set-up and administration costs money, which has to be added to each of the single fees.

I would totally agree with this. Those who are not of a high grade and have more regular tests, not just one in the four year period of Registration, should be paying an extra amount. I understand that their £300 at present includes any retests.

Depending on fees to be charged. And the cost of the renewal of licence.

Why should we pay for something that is forced upon us by the DSA when they already charge us too much money to renew our licence?

I have reservations about the cost to inexperienced or ADI's who struggle whereas strong ADI's who have past this stage in there carreer will push for this proposal.

The cost of the standards check must be proportionate and not be used as a way of generating additional profit for the government

As long as this is not a back door opportuntly to increase fees

A potential "Cash Cow"

If you cannot provide details of the way in which the registration fee is currently structured, how can you determine the level of the standards check fee. Sounds like a way to get more money to me...

Very good idea

Provided the fee to renew tge ADI licence is reduced accordingly.

I am comfortable with a single payment. Split payment could lead to increased admin. costs and consequently increased fees.

We do not consider this as a major issue, unless it also allows additional attempts.

currently higher grade instructors pay the same amount as lower grade instructors. If there were a financial impact in having a lower grade then it may incentivise people to embrace CPD more

We are happy to support this as it will better align the payment of fees for registration and standards check to when that they are actually required.

Where is the justification for charging for a check test we have already paid in our license.

Makes things more affordable while training, good idea.

Very much agree with this. I feel that often ADI's fail to recognise that the current registration fee is what covers the cost of their check test and so having a more transparent system will assist with this.

as long as the average driving instructor is placed under financial hardship.

This is a purely a money making idea in our view. DSA insists it does not know how much checktests cost, or what other elements of the current £300 ADI fee pays for, so how can it reliably produce separate fees?

again it gives more flexibility to the ADI

Provided it doesn't mean increased costs for the ADI

it may result in the standards check tests being failed more now than at present

Other than making more money from grade four ADI's what's the point? It will only lead to more complaints from people who believe they have been graded unfairly. Just put the prices up to cover the extra costs.

Our answer is based on the new cost of registration plus the cost of one Standards Check NOT exceeding the current registration fee of £300. A separate fee would enable instructors to book a Standards Check 'on demand' if they would like to have the opportunity to improve their grade. It would also encourage ADIs to improve their skill level in order to achieve a higher grade and reduce the frequency of Standards Checks required. However, we do have concerns that following a "user-pays" policy may potentially result in examiners awarding lower grades in an effort to increase Agency revenue.

This will make the process more expensive for ADIs as I expect the fee would quickly increase in price so as to place an additional financial burden on ADIs the majority of who are self employed.

How much more money do you want to take from ADIs who supply you with work?

This is simply a money making scheme by dividing registration and check tests. How long before fees for both skyrocket. I would want rock solid legal guarantees this would not occur before accepting any part.

We **DISAGREE** with this proposal. Although we can see the benefits of restructuring this towards a 'user pays' system there is a perception from within our membership that the standards check failure rate may increase and therefore increase the revenue that is generated. We would like to see how the introduction of the new standards check affects the pass rate before considering introducing this measure.

We strongly agree that this would be a sensible and fairer measure.

We **agree** with this proposal **BUT** our members do have concerns that ADIs might think they are being failed in order to generate greater revenue for the regulating agency. We would want to see careful monitoring of the system to ensure fairness.

Agree. We agree that SC should be available on demand, however, historically the DSA suggest they don't know costs of individual elements in the licence fee, yet they have been provided, (in writing). This should not be used as an opportunity to increase fees - elements need to be correctly priced. We understand ADI testing has earned a £1 million surplus, yet bike tests lost £12 million over the last four years with car drivers paying for this loss. We have little confidence in the methods the DSA use to account for the TRUE cost of the registration fee.

We are happy to support this as it will better align the payment of fees for registration and standards check to when that they are actually required.

Feedback on question 17

It is proposed that we make some changes to the ADI grading structure (paragraphs 106 - 108 of the Consultation Paper). How strongly do you agree or disagree with this proposal?

it should be graded still with 1 as top grade. This is line with most exam results

This can only be a benefit

I do not think there should be a grading system, either standard reached or not

GRADING IS ONLY APPRECIATED BY ADI'S . DO AWAY WITH IT. THE PUBLIC KNOW NOTHING ABOUT IT.

Personally I think a simple pass or fail would be adequate as the check test only shows how someone performed during one hour perhaps in four years - a 'snap shot' as an SEADI descibed it once to me. This is hardly a fair reflection on how good an ADI actually is.

Often grades don't give a true reflection of ability. Depends which examiner you get.

again what do the pulic know about the stucture. Keep it simple and transparent

grading is a joke. one instructor in this area puts on his website he's a grade 5 when it is well know he a shouter.he can keep his gob shut for an hour with the right pupil and many practise session before test. on one of my check test i was told i was a good instructor who clearly knew his stuff but was given a 4 because of a disagreement on a situation. i have no problem with advise but to be told that the examiner gave a grade 6 to an instructor in his words would be 'c+ap today' what a grading system

I personally like the grading structure as this means that we can use this as a selling point and does show the difference within the industry.

Even though the public seem to have no interest in it, grading an instructor based on one hours work is ineffective, though, so was the proposed star rating (who stays in a 2 star hotel), a grade based on overall performance is better.

The ADI current structure is seriously flawed. It should be a simple pass or fail. No grades at

this stage. Perhaps more advanced tests for ADI's wishing to achieve something higher but ADI's should have only one grade _ a pass.

The current grading is of no real value to the public whereas it is to be hoped that by using meaningful phrases this will serve both the public and the ADI better.

Personally, I don't think it really matters. The current system works for me.

Is the current system 'broken'?

maybe have more than the 3 acceptable levels.

This needs explaining in more detail

Why grade an instructor they are either qualified or not (i am a 6)

To grade any ADI on one arbitrary hour lesson is patently ludicrous

Grading is unnecessary, if the NDRS is to be adhered to then it's either qualified or not. So pass or fail at the end of a standards check, fail would go through the same process as 3 or below is currently. Too many instructors advertise a grade they do not have. For local authority work there would be a more even playing field if everyone was a pass.

Grading should be scrapped. It serves no purpose whatsoever for self employed people running a business

It is apparent that more long term grade 6 instructors are losing the grade for very minor disagreements with the checking examiner. Is this because the proposed changes have to be justified

A structure which is easier for the public to understand would be beneficial.

Please don't waste our money! In the seven years I've been an instructor, I have NEVER been asked my grade! In fact, I would go as far as to say that most of the general public have no idea the grading system even exists.

The grading of ADI's is nonsense. Either an ADI is qualified or not - the level is inconsistent and based on a tiny window (the standards check). The revised standards check is still based on flawed criteria.

Why change a system that is proven and not broken?

A grade does not make a difference today or in the future.

Not bothered either way. Just want the useless instructors removed!

Abolish the standards check all together

Most people in the UK are now used to the current way of grading so why change it if it is working.

The current system seems flawed as some grade 6 ADI's have pretty poor pass rates whilst some grade 4 ADI's have far better pass rates. How can that be if the 6's are supposed to be that much better?

Anything that raises the overall standard of driving instruction is essential.

The current grading structure means absolutely nothing to anyone unless they are actually in the profession.

structure will always be irrelevant, one examiners opinion is not accurate to persons daily work

I do not find the format at all clear in the proposal -- can ADIs receive a clarification of the 4 levels

There is no point for the current 1,2 & 3 grades - unsatisfactory is unsatisfactory, whether more or less, makes no difference. Effectively there only seem to be 4 grades anyway, educational, 4, 5 and 6. So why not make it grades 1-4 instead of E & 4-6. An ADI receiving an "unsatisfactory" on a check test should be given a 2nd chance with a different examiner after which, if still "unsatisfactory", should have to re-qualify.

Without having read the proposal I'm not quite sure how it would be restructured, but I do think the present format is inadequate.

With the current scheme the ADI has something to aim high for and prepare for. With a simple pass/fail the ADI may be inclined to do the bare minimum to pass.

whats wrong with the current system

Its wrong just to access a ADI in a hour shouldn't it be a bigger picture and I don't think some of them remain impartial that's the SE

The public look with trainees unaware of the meaning, they have no understanding of the grading system but there are many good grade four ADI's doing excellent work to highlight them as average would be wrong

Grading is subjective and needs to change. Can they teach to a standard or not ?

Not too fussed but you are either Competent or Not Competent to instruct, can't see the benefit of anything else.

I believe that the grading of 3 or below is not required for a check test. To pass the qualifying test is realistic as it will benefit the trainee instructor or PDI by giving them a level of current ability, knowledge and skill at time of assessment.

Grades should be removed and a simple competent or not recorded (and I have been grade 6 for the last 5 check tests)

Other than amongst ADIs the current grading system has no meaning to the public and they have little or no interest in it.

Effectively there are, currently, only 4 grades (3 for Fail & 3 Passes)

It would be tinkering with a system for no practical advantage to anyone.

Would not impact on anything. The public don't care.

95% of the general public have no idea about Graded ADI's. Do we grade Doctors, Dentists, Architects? No. The more weight DSA puts behind 'grading' the more it stigmatises ADI's.

The current structure is sufficiently clear and understandable to all.

The grading structure would be better, "worded" along the lines of OfSTED maybe?
Outstanding, very good, good.

This is downright daft. As we have people at present conducting check tests who have ☐ Never taught a real learner Have only been examined and trained themselves in role play Do not have

to score a grade 6 themselves in order to conduct check tests How could any rational person

If it aint broke, why fix it? Why do people mess around with a system that has worked well for years? We are at the sharp end, not office types!

Give better feedback

The grading structure is in my opinion nothing short of a joke. I am aware of ADI's who study the "tricks of the trade" and pass a test with flying colours then go back to the all too common cost saving measures in a real lesson such as spending too much time talking while parked etc. The real test of providing good coaching and value for money is the retention of pupils, the "Standard" is therefore self policing. Any form of check test or standards test should be scrapped

The current grades are not generally understood by the public. The public would expect the top mark to be Grade A.

I agree that 1,2&3 are a bit redundant. However 'Grade 6' is well known. Making Grade 6 instructors a '3' under the new system might make them look like they perform poorly. I think 6 grades is good, allowing Grade 6's to maintain their status as far as public perception is concerned, if numbers are to be retained. With regards to descriptors being used instead of numbers, this would be less confusing and public perception would not alter and might be preferable. However 'fully competent' describes a Grade 5 well, but something more like 'exceptionally competent' or something similar would be more descriptive of Grade 6's. after all, there are only 6% of ADI's who are Grade 6's.

But I would like more information to be published to show how you will get from the scores on the marking sheet to the final grade given. I would also like to know how the DSA propose to retrain and assess examiners to ensure consistency under the new system. One of the biggest issues I have with the current system is that different examiners have different opinions as to what is important in teaching and some focus too much on identifying and resolving small faults rather than seeing the bigger picture. It is difficult taking 'advice' from an examiner who has not taught a student for many years when the advice they give is often based on outdated teaching methods. All your examiners need to have had training and most importantly EXPERIENCE in using customer centred learning techniques (I still prefer the term coaching).

I do not believe the present grading system serves any purpose, and simply changing the numbering system will achieve nothing. Two grades only are required - "Satisfactory" and "Sacked"!

Examiners do not tend to mark consistently and tend to have differences in wants and needs so this can result in a different grade. The Ofsted inspection just gives a Satisfactory or

unsatisfactory. This would be a better method.

Current system is meaningless to the public

The current grading structure is clear and works well, why fix it when it's not broken

If it works leave well alone

Too many people get a grade 6 for just performing well for 1 hour in front of a SE

Being a grade 6 Instructor a lot of my business is gained because of my grading it is quite simple for a prospective pupil to understand how the grading system works why change this? I know that talking to Instructors that are of a lower grade that are not concerned as to what you do with the grading system now, I understand that it may be even easier to achieve a grade 6 we want to keep standards high not making it easier. Too many Instructors just achieve a grade 4 disgraceful in my book these are the people we need to get improvement from although again I am given to understand the Standard Check will be more frequent, I know Instructors who have been doing the job for years and have never achieved any higher than a grade 4 maybe you should be doing something to get rid of the total lack of unprofessional Instructors that just coast along taking money from people with very little work done.

Making this easier to understand for the general public will be helpful.

More information is required.

At least with the present system everyone knows where they stand, what good will changing the grading systems make, will it be easier for the pupils to understand how good ADIs are and regarding ADIs who have worked hard to gain their grade having it taken off them will leave ADIs upset.

Why oh why can ordinary members of the public give paid instruction and bring people to test when ADIs have to pay all this money. Wrong.

It is much more important to give all PDIs the best opportunity to demonstrate their skills.

I do not have any problems with the current system but if it can be improved it should be considered

Why have grades at all? ☐ Pass or fail is good enough – what other professions have to go

through such a grading system on a regular basis?

Agree, given it will support differentiation from the old standards check process.

Any change needs to be thoughtout. There is no point in replacing one pointless system with another.No one really benefits from a graded system except may be the individual concerned. People very really ask for a grade. It is time to be more realistic,a pass certification should be good enough,which is supported by the green badge.

However, you need to improve the quality of examiners.

Any grading system that people in the industry understand is acceptable for that industry. However a system like schools would help the public for example have a worded grading system like schools - "Outstanding", "Very Good", "Satisfactory", "Poor", "Very Poor"

why start with a 3 and not basic ABC or 321 system .

Gradings are available on the internet to change it would confuse the instructors and general public.

Why can't you just leave things like this alone, ADI's are getting confused with all the changes, we get used to one thing then it is changed again.

what ever the grade have it put on the badge so the public can see how awful these people really are

I don't think adding a description after the new grading would be appropriate. If someone has passed and is an approved driving instructor, surely this is enough without the need to then add a grading system.

At least keep some kind of grade, it does add value/status.

I think slight changes would be ok as most people even adi's don't respond we'll to a test situation so a good instructor may end up with a poor grade

Change for changes sake. A grade is a grade. It's only adis that take notice of it anyway. Never been asked by pupil

I think this is a good idea and will encourage the best training and delivery however I remain

skeptical that current approved training providers will deliver quality rather than quantity

Only now are prospective pupils asking about the grading system and it is easy for the general public to understand

The grading system seems to mean very little in the first place.

Think the grading system is fine... and the public are just starting to be more aware of it... publicise it more... but change the competencies to reflect the grade.

Keep same system , but reverse it so grade 1 is top

large organisations will use a company percentage rate , not individual percentage pass rates, so an uneven playing field would exist between large organisations/schools, and the independent instructor.

It doesn't matter if you call it 1,2,3 or A,B,C. A grading system of any kind is relevant but not essential. It is mainly relevant to the ADI and DSA - pupils have almost no interest (I can count on the fingers of one hand the number of pupils or parents who, in more than six years, have asked my grade).

I do not agree with present system. CPD and further qualifications should be taken into consideration

Perhaps a worded system of grading removing numbers completely.

There is so much uncertainty and although it is an odd system, there is nothing to suggest that it would be IMPROVED... just changed for the Sake of Change (and to justify more charges?)

it should be scrapped altogether. If an ADI is substandard, they should be given warning to be removed from the register. That will encourage more ADI's to improve their skills or ship out.

I think there should be more banding than just 4 grades. Descriptors are a good idea. I would like to see more bands with a view to this information being easily understood by the public,

keep it simple.. reached the necessary standard - pass - unacceptable fail?

The public are generally unaware of the grading system. I am happy with the new standards check format which may or may not be changed to a grade

Grades 4,5 and 6 give an ADI something to aspire to. Grades 1,2 and 3 all seem to mean the same

Prefer wording rather than a numerical grade

Having 3 categories of substandard is not required. the numbering system is fine and does not need changing

And it should be done yearly, not every 4 years, we are supposed to be at the top of the game, if we are poor in the first standards test, we can not improve for 4 years? It is not enough monitoring

The point raised about people seeing 1 as the best is a valid one. The structure does need to be changed so a 1 is the highest grade and 6 is the lowest. Makes more sense to the public. Also, if the new vocational qualification comes in, then the need for an 'Educational' should not be required, so removing that and the role play element I see as a natural progression.

If a new standards check is introduced, then all ADI's should be checked at least once every 12 to 18 months and if successful a competence to instruct certificate issued.

If the problem is that the current system is too confusing for someone who normally expects grade 1 to be the highest I don't think this would change with moving the numbers, therefore the use of descriptors as per the standards check form, rather than numbers may be the way to go.

i strongly believe that all elements to improving one self due to courses and experience should be taken into consideration, there should be a minimum requirement to obtain on an annual basis

I don't feel that the check test is a good way of assessing an instructor's ability. A periodic course would be more beneficial.

I would have preferred to be able to answer that I neither agree nor disagree.

This needs to be easily understood by public

I think DSA are attempting to change too much all in one go

Present system is rubbish. You instructors out there with good grades but give poor quality

tuition at rock bottom prices.

I believe the proposed system would introduce some clarity and simplify the system. In addition, it would be more in line with current standard teaching and ofsted approaches

Old system of grading is fine why make it difficult for General public to understand. As most of general public don't really bother with grades all they care about is how cheap the lessons are or which ADI charges less..

I think the current grading system is good-and being a current grade 6- I use my grade as a selling tool to my clients- I think the public should be made totally aware of the grading system and they should be made aware of the grade of their trainer, otherwise what is the point of a grading system if the public (and as I am a presenter on many national schemes and met thousands of parents) know nothing about the grading system. It is time for change- the first question always asked by the public is how much do you charge- they never ask about the quality of the training- which is so sad especially for those ADIs who have worked hard to be different by expanding their knowledge and skill set..

present system is rubbish!

I have spent many years in the industry, I am pleased to say that the grading system works well having attained a grade 6 last 2 check tests...But the general public are NOT INFORMED...make this more apparent to everyone then it would be for the public to use the information to choose an ADI.

The current grades broadly work well

Providing the registration fee is reduced inline.

Gradings are useless. If you are nervous you may get a poor grade when you are actually a good instructor. All the grading system does is show which instructors cope with the pressure best.

A modern approach with meaningful descriptors is preferred

May be more useful for the public but I would hope within the industry people would be able to understand the grading structure regardless

BUT LET THE GRADING SYSTEM REFLECT THE TRUE EVALUATION OF THE INSTRUCTOR DO NOT PROPORTION GRADES IN A WAY THAT MANY SCHOOL EXAMS

ARE DONE

If it is not broken don't repair it

The current grading system is incomprehensible, tends to measure compliance to a style rather than to a standard of ability.

Not necessary.

I don't understand what will be gained.

As long as it is clear to clients what the grades mean

Not sure what impact this will have either way.

the highest grade should be 1 and not 6 as it is confusing

Descriptors would be far easier to understand than the current 4, 5, 6; noting that very few learners see to have any interest in an ADI's grade.

It has long been felt that there is a large gap between grades 4 and 5 and there should be a sub grade. Likewise the use of numbers in this fashion can be confusing

The grading structure is very fair at the moment. Can't see any benefit in changing it.

I don't think that the current way reflects your ability to train and induce learning

The current ADI grading system is confusing, especially to the uninformed members of the public who do not understand that Grade 1 is the lowest level

An ADI is either fit to instruct or not. A stressful assessment of 1 hour is no basis for anything else other than subjective opinion.

Should be a eight tier structure grades 1 to 8.

I Believe An A.D.I,s Pass rate should be taking in to account when grade is awarded

Current grades are confusing to Public - □a grade 6 instructor might have very strong forceful

teaching style with weaker people skills, Learning styles are unique and individuals need individual teaching styles to match.

This may remove the "elitist" attitude that comes with certain ADIs

it must be clear to the public telling them how many grades there are.

Good idea- would be interesting how this would work as currently many ADI's who I talk to seem to have been down graded in the last few years and nobody can understand what's going on!!

no need to change the current grading system. the public just need to be informed properly of the relevance of the grades and there meaning.

The yes or no decision in the review section should be made from an overall percentage mark obtained from the assessment of all the Lesson Planning, Risk management and Teaching and Learning sections.

It's fine as it is

Car insurance companies know the current format, unless u completely make it clear to them, with an explanation to go with it

keep it to numbers. I dont think wording had the same impact.

Perhaps wording would help potential pupils to understand grading better.

he grading structure needs to be based on test results combined with the number of pupils presented for test. ☐ Check tests are a complete irrelevance and do not represent the overall standard of an ADI except as a snapshot during one, unrepresentative lesson every few years.

don't agree with grading structure as it is open for misinterpretation pass or fail should be enough

it works as it is.leave it be!

I have been instructing for 11 years and have only been asked once what my grade I am.The vast majority of pupils do not know there is a grading system. And those that do think a grade 1 is the top grade.

Is it change for change sakes

Change this certainly - the public haven't got a clue about what a grade 1 instructor is and get it mixed up with "1st class" and things like that... people might even harm their business by advertising grade 6 - it's that confusing

Why change something for changes sake, the industry fully appreciate the grading system at present and frankly the general public are not interested only being concerned about cost of lessons. Why fix something that isn't broken

Only agree providing it is a fair and equal way of doing this

Change should be grade 1 is highest, this will be easier for the public to understand. ☐ Wording is too vague

Why do we need to be graded? ☐ Why not pass or fail?

most customers do not check the grade and don't care what it is if they enjoy the lessons

The standards check is just a snapshot of one small moment in time of an ADI's registration period. Credit should be given for the commitment they have to CPD and also whether they have committed to the DSA 'Code of Practice'. Credit could also be given for additional qualifications held, ie DipDI.

I think the current grading system is fine. It is the way that it is administered that may be the issue. For example, if a student does not know whether a grade 1 or 6 is good or bad, then more information needs to be available to them on why it is important to know. If this simple system is not known by the student because it is not laid open, then changing the grade to a few sentences will be open to the same problem, and details will be hidden.

Any grading structure is completely unnecessary as 1. It only takes into consideration an assessment made in a very short period of one day. ☐ 2. It could show that a poor instructor had a lucky good day or a good instructor had an off day. ☐ 3. It could have an adverse affect on the business of the private instructor which would not be seen in the business of the larger driving schools.

Why confuse people keep what we all know and it works.

Again no firm opinion as I do not fully understand the new grading structure (seems as though one has to get a certain number of points but it still unclear as if a certain topic is not covered on

the check then no points can be awarded).

I think that Fleet instructors should carry a dual grade. 1 for Fleet and 1 for Learner instruction

With the number system you can understand exactly where you are. Using words like Satisfactory or Fully Compliant are very ambiguous.

unfortunately the public are ignorant of any ADI grading, so to a degree I think any changes would be a waste of time/money

the marking paper seems to be more detailed and ensures we are teaching to the correct standard more fairly

The present 1 to 6 does seem to be the wrong way around. While I was training it seemed that every instructor claimed to be a 6 while I understand it's only 7% so perhaps some public information would be of some benefit.

The Grading system means nothing to most people. Most would assume that a Grade 1 Instructor would be the best. Students never ask what Grade you are or even if you are qualified. □ The Grade awarded is based solely one persons opinion of a 1 hour snapshot of the Instructors performance with a particular pupil on a particular day.

Need clarity on what the new grading structure would be

I do not agree with the current structure or any structure other than an ADI is providing instruction to an acceptable standard. The check test is conducted by an individual who gives a very subjective personal opinion. As we cannot have a system that is guaranteed to be to a consistent standard then there should be nothing other than pass or fail.

My agreement would depend on the actual changes to be made.

the current grading system is easy enough to understand not sure why changing it wil be better/easier to understand

As long as the person conducting the check test is a former ADI of good standing, and not a person who has previously failed the part 3 exam 3 times and then has gone on to become an examiner.

Why??

This needs changing at the moment it is laughable.

A Good Idea but perhaps would lead to more confusion unless properly promoted.

Is there really any need to do this?

the current system means nothing to the general public. A pass or fail would be easier for all, with a check/standards check held every 2 years regardless of grading.

the grading structure as worked for for all these years, I see no point in meaning something that's not broken.

i feel that grading system needs to change.i feel that its totally unfair. i feel that if you reach a certain level then you dont need to graded. should be the same as motorbike instructors. most of the grades are set if you can hold your nerve for one hour. i get very nervous on my check tests. hence the reason why i will never reach a grade six.

Can't think of a better system

The grades are only understood by the DSA and instructors. Been instucting for nearly 20 years only been asked about grade once. Public totally unaware of it.

I have always had a major issue with the grading system for ADIs□Currently, I am a grade 4 having recently completed my 3rd check test since I qualified in 2004. On both previous occasions, I was also graded 4.

Not sure i like the idea of worded grades, numbering system seems fine to me and they are now using a numbering system to grade restaurant and food hygiene establishments, the public unstand those , why not follow similar grade and have it displayed in car next to adi licence

However the grading system is structured, the main thing should be that the general public are aware of the grading system when looking into choosing a driving instructor. And the grade should be displayed on the ADI badge.□This could encourage ADIs to improve their skills.

I agree some changes need to be made,but again with consultation with such groups as the MSA.

The current structure makes no sense to anybody other than ADI's.

I'd like to see more information on this before fully agreeing

I simply feel that you should either be a qualified ADI or not. A check or standards test cannot clearly indicate how good an instructor is in the short time they take to complete. A poor instructor can put on a good show or, like myself, a conscientious instructor can just go to pieces. I hate the whole set up to be honest.

If it is not broken don't fix it

What is wrong with the current grading

We are graded on the results of ONE test of an hour as in all cases a lesson might not go as well as normal yet we are judged solely on the outcome of this lesson

Pupils have no concept what grading is. They don't even know that they are being taught by a trainee, when they do find out they are not best pleased, especially when they fail.

The grading doesn't take into account customer service, it doesn't take into account that I specialise in nervous, nervous people who suffer from anxiety, that some Pupils have to take 'Propranolol' just to get in a car. It doesn't take into account many different things. The system however should be kept simple. Always easiest is having someone 'star' rated, like a hotel or restaurant, favorite movie etc. If the Instructor far and away exceeds this, then he / she would be rated 'gold rated.'

Something that registers with a learner.

We support this as it will clearly differentiate the current check test and the new standards check.

I think the structure is rather confusing and not particularly transparent. I think Grade1 should be the highest grade for instance. I also believe a more comprehensive written report should be handed to the instructor so that he/she knows where their strengths and weaknesses are and what action needs to be taken to improve their instructional ability. A verbal commentary at the end of the check test is not satisfactory in my mind. It is very easy to forget or misinterpret comments.

It will only matter if the public has access to it.

Keeping a grading structure is important. However the general public are unaware of what they are. making them more like OFSTED: good, excellent, outstanding etc would be more understandable.

The current structure seems fit for purpose can not see reason to change it

1 to 3 grade on current system notes below standard. 4 to 6 limits grading to 3. Why not just have 3 gradings? (makes sense and is logical)

The public have no idea of the grading structure and any proposals so far would not improve that.

grading 6,5,4 no one knows outside the industry i'm a grade 5 instructor but do explain to parents and pupils the grading is like gold silver and bronze not hard really

The Grading is in effect only 3 grades. You could make it 1 is fail, 2, 3, 4 pass

All ADIs should be satisfactory or unsatisfactory. If someone is effected by nerves or circumstances on the day they may get a lower grade which will affect their business. If the public understood the grading system then grade 4 or 5 instructors would probably loose customers, when they are probably better than one assessment. Gaining other qualifications should be their way of competing - it's fairer.

What is wrong with the current, easy to understand system?

I do not think that the grading necessarily needs changing. I am a GRADE 6 instructor and feel that amongst ADI's we all know that the Higher the grade, the more competent the instructor. Just like other graded areas eg, piano exams... the higher the graded number 1..2..3..4..5..6 the better you are at something. I would agree that if letters were used then an A graded instructor would definately be seen as being a lot better than a grade F. But where numbers are used then I agree that the higher the number, the better the competence!!

What is the point of this?

The Grading structure should have a Grade 1 as the highest grade. It is stated in the proposal that the current grading of 6 as the highest is confusing and then proposes a grade 3 as the highest grade, which doesn't take into account how it is viewed by those outwith the industry

Current grading system is confusing

no one has ever asked what grade I am. the public just want to pass their driving test. Altering this is meaningless.

I feel that the system should remain largely 'as is' but with the inclusion of descriptors for the level of competence.

I don't believe that you should differentiate between ADI's through a grading structure but instead through CPD. An ADI either can or can't. CPD is a better measure IMO of an ADI's commitment to their role and level within that role.

The Paper is confusing here. A Grade 5/6 ADI already has little enough 'product differentiation' from those deemed less competent. The proposal seems to make this less visible. Also, my Pass rates have gone down as the years have gone by as I take on more difficult pupils. How is this reflected in statistics ?

Unless an ADI grade is made public the grade is only relevant to the ADI concerned. After a recent check test I received a full and detailed assessment on my performance which I found to be helpful and more than satisfactory.

I think the grading is fine as it is

I think it needs to be clearer so the public know what type and standard of ADI they are paying for.

The public have no idea what numbers mean. Presumably the numbers will be changed to sentences ie Poor- good instructor?

We agree that there needs to be a measure of competency but how this is presented and how easily this is understood is open to debate. A measure which includes a descriptor is preferred as it reduces confusion as to whether a grade 1, for example, is good or bad.

The grading system should be simplified, the general public don't care about grades, they just want a qualified instructor

Change the system to differentiate between the old and new, but perhaps use a wider range of indicators as the four grades is a little too narrow and leaves little space for interpretation, given the wider range of options proposed in the Standards Check.

If the whole business is taken in to account e.g. Pass rates along with how many presented for tests. Initial presentation and personal presentation. Teaching methods / materials. Additional qualifications such as Fleet / ORDIT and other in the industry. Those with just an ADI qualifications need to prove otherwise.

I can't see the point of 1-6 grading. The ADI is either good enough or not

Until an alternative for the skills check is introduced that prevents cheating then the grading system is meaningless

Dumming down.

test passes should be part of any grading given !

Descriptors may 'Shame' this would not be constructive to encouragement to improve, and could lead to dishonest declarations to insurance companies etc etc

Not bothered either way.

Grading that would be useful to pupils, not based on pass rates as this can be down to standard of pupils, its know that if you want a hi pass rate dont take nervous learner to test.

Current Grading system works well. it appears Only grade4 instructors don't like the system

In 35 years I have only been asked 'what grade' once'. A more customer friendly system would be an advantage.

MCI supports this and would need to consider how such a structure could work for motorcycle ATBs should the system be applied to motorcycle training at some point in the future. However, grading systems should as a point of principle be easy for both ADIs and the general public to understand. Access to information about what the structure means should also be made

he grading at the moment is wholly inadequate and can easily be manipulated. It takes no consideration of the pupil experience and hides bad teaching practice eg, tutting, shouting, phone usage, going on shopping trips, piggy backing etc none of which would be practiced on a scheduled check test. There needs to be a secret pupil scheme to catch out these lazy instructors

Grades serve no useful purpose to customer or instructor and should be scrapped. Standards check should be pass/fail.

The benefit of this will be dependent on the quality of feedback given following the standards check test.

Pas or fail and no grading, grading creates division between instructors

It's extremely important that instructors should be able to aspire to a Grade 6 or similar. The grading system is the only independently verifiable method of assessing instructor competence. The best instructors actively seek to improve their grade - the less able instructors only seek to discredit it and it concerns us that, as there are more Grade 4's than any other, their opinion will win the day. This has nothing to do with 'elitism' and everything to do with aspiring to be the best - and the best should be able to publish their Grade to help them increase earnings. The better you prove yourself to be, the more you earn. This is how all companies encourage their employees to improve and there's no reason for the tuition industry to be any different.

current system seems to work ok but if it can be made more straight forward then i have no objection

the general public does not even seem to be aware that driving instructors are graded, when I talk to potential pupils about this, the general 17 yr old doesn't care, parents seem to be a bit more interested.

Grading should remain. Written feedback should be given regardless of pass or fail to help improve instructors standard.

"The current system is felt to be confusing for some who normally expect grade 1 to be the highest grade." If this is the case, why are you proposing a similar structure with 0 at the bottom and 3 at the top. Number 1 will still be close to the bottom.

This should reflect so much more and have a grading system members of the public can understand. Also longer checks are needed, 1hr lessons are very rare now and it is unfair and UN realistic to expect an ADI to shorted and adapt lessons to 1hr when that's not a normal lesson to then.

Is there really a need for change, or just tweek the process

As a grade 6 instructor MYSELF,,and a rate of say 90% are grade 4 Why oh WHY cannot the GRADE 6 INSTRUCTORS BE REWARDED by having their names published ? The others then have to UP THEIR game to have their names published as Grade 6s

need to know more about the proposed changes

Current system very patronising & often totally inaccurate & unjust to those carrying years of 'coal-face' experience. A simple pass or fail is adequate. The quality of an ADI is measured by

the 'real world' market forces of how busy he/she is & the price charged for a lesson, relative to the average price of the geographic demographics.

one should be able to earn an A* on a check test, the grading system should instructors displaying a very high standard. I think the DSA sometimes forgets that most ADI's are in business and such things have a financial benefit to them.

As an ADI why change something that works well we all respect it and know where we stand

Is working at the moment, may be slightly the wrong way round. Why change if it is not broken. □What ever you change to, it end up the same.

WHY? I been instructor for 10 year, no one ever ask me what is my grade?

There a gulf between a grade 4 and a grade 6 ADI. This needs to be clearly recorded and clearly understood by the consumer - you wouldn't consider a 3 star hotel on a par with a 5 star.

The check test looks like it will be more realistic to how we actually perform, so a good thing

The DSA and ADIs understand the grading structure, general public do not.

The current system works well and is understandable

This should be done later when the results of other changes are understood, especially the results of the new check tests

Confusing question because you intend to change the qualification process and the way that candidates will learn and be assessed

If it's not broken why fix it!?

Yes, but wouldn't it better to make Grade 1 the top grade. very, very few clients know or indeed care about grades. Personality, cost, reliability and the ability to get on with the client seem to be more important.

The public don't recognise or care about our grading so makes little difference

The current system is confusing unless you know how it works.

Before any grading can be published, it needs to be in a format that prospective customers can understand.

There only needs to be a pass or fail, grades mean nothing to the general public

The structure should be reformed, but I do not agree that there should be woolly descriptive terms used. □ Everyone understands a formalised numerical grading structure, but members of the public do not understand why a top-grade instructor is Grade 6, when they expect him or her to be Grade 1

The standards Check should have an option where the ADI can pick the examiner up from the test centre then drive to the pupils house for an actual lesson, instead of the false lesson in an area where the ADI wouldn't normally take that particular pupil at that point in their lessons, the 'chat between ADI and examiner could take place in the car on route to and from the pupils house, this would be an accurate standards check from start to finish.

scrap the current grading system it should only be pass or fail and no more because of the poor performance of some SE's an ADI should not suffer

Use letter grading, a being best, perhaps e worst

For some reason the whole world has gone mad renaming everything no matter how you word things the end result will be they either perform well enough or they do not

For some reason the whole world has gone mad renaming everything no matter how you word things the end result will be they either perform well enough or they do not

The structure needs to be readily recognisable to the general public.

I believe this would be better as it allows an ADI to have a pupil who normally do their lesson to take part on the new standards check without hassle as my last check test was at a time that was not really suitable for me or my pupil. Also if it is left to the ADI to book his/her check test then what is the time frame for us to book. Surely some ADIs would never book one to try and get out of doing one?

Competence to teach as endorsed by DSA through assessment and the green badge is key. Learners do not generally take too much note of grading systems. Grading systems are dependent on such a small window of a one hour check test and what happens on the day ... not always a good reflection of an instructor's ability particularly if they do not perform well under assessment conditions. Standards of pupils they take to test, examiner views of instructors they

regularly see at the test centres etc are far better benchmarks.

Having the current grade system ensures that ADI's strive to achieve the top grade

I feel that the check test is an outdated process and should be replaced by CPD

i ve looked at the standards check form and it does look easier to understand compared to the current one.

Pass or fail should suffice.

The DSA have promoted the grading system to the public over many years, much of the public is now aware that 6 is the top grade ,to change this will only confuse the public and let down the top instructors.

New system would complicate things that public don't really understand anyway

How will it make a better instructor? A grades a grade

What percentage of the public are aware of the current grading structure and what impact with there be in changing it? If only 6-7% of current ADI's are grade 6, then majority of learners are taught with "minimum standard performance met" instructors so are you just regrading the structure for the sake?

Keep 6 grades but re work banding. Better explanation/phrases. Not jargon as it is.

Grading structure seems fair.

This is nonsense and only tinkering with a system that has served the industry well for many years. The general public do not care what grade an instructor is as they will only buy lessons at the price they can afford and the majority of that is on recommendation.

This definitely needs a shake-up.

I'm happy with the current grading structure.

It would be useful to have a structure that is a standard Grade of A, B or C and an explanatory note on how to achieve a top Grade of A

Gaining a grade 6 appears to be easy to some instructors yet they seem to be useless for the paying customer, I was told by some instructors to get a student and to go over everything I was going to do before hand and make the check test a breeze, I didn't do that as I opted for the examiner to role play so I knew if I was doing ok or needed vast improvement.

The current system is not practical. An ADI can achieve a Grade 5 with only x2 boxes ticked with 6 on a check test. The same ADI can get x12 boxes ticked with a 6 and still get a grade 5? NONSENSE!!!!!!!!!!!!!!

CUSTOMERS OBVIOUSLY WANT A RELIABLE INSTRUCTOR - THIS GENERALLY COMES BY PERSONAL RECOMMENDATION

In 10 years have never been asked my grade or check test results by a pupil

It should be a simple pass or fail structure.

Based on research into training and feedback we see no need to grade ADIs on their performance. A standards check only provides a snapshot of that instructor's performance at that moment in time in a limited range of circumstances. The result should be expressed as either satisfactory or unsatisfactory. Grading has a tendency to limit development. The new Standards Check form should support the examiners in their assessment and enable a meaningful discussion to take place with a view to agreeing the strong areas and those areas that would benefit from further development. Research in education generally has indicated that grading leads to learners dismissing the feedback being given. We also believe that where an instructor's performance is unsatisfactory they should continue to be provided with a written report outlining their weaknesses.

Even by switching the current format around has to be an improvement e.g. Grade 1 being the best and Grade 6 the worst. Wouldn't disagree with words being used rather than numbers e.g. superior/excellent etc

Not sure if this will help the pupil to decide on which ADI to use

I feel that the grading should be used to encourage ADIs to continually improve their skills not as a marketing tool i.e. grade 6 is the best

I feel too many instructors are happy if they retain a grade 4

Check tests only give a snapshot of the overall performance of an instructor with too many permutations at stake. I believe grading should be done away with, you are either competent or

incompetent.

The current adi grading structure is fine and does not need changing.

It needs to be relevant and easy to understand but in my experience the general public have no idea and do not ask what grade an instructor is.

The perception and assertion is that the general public don't understand the present grading structure, and that those who would have an interest in it would be more likely to make the assumption that a "grade 1" is highest / best not the lowest / worst grade. I do that think a change to the grade being a worded description will improve that. If you look at websites like "Trip Advisor" and Amazon, they use a "five star" rating or review. The grading of "five stars" is widely regarded and commonly understood, and, although you would probably get wide variations in perception of what might be the specific differences between a 2*, 3*, 4* vs. a 5* hotel, for example, there would be generally understood common levels of perception. I would therefore encourage you to create a worded graded structure that has a direct correlation with a "five-star" structure.

I can't see that it would make any difference. If you had, 'good, very good and excellent' for example... it would be the same as 4,5 and 6. I've never had a pupil ask for my check test score.

I don't think it will make the slightest difference to a pupil. All they want to know is how much a lesson costs & how soon can I take my test. □ I've only been asked once in 12 years what my grade is as an ADI, & the pupil didn't go away even though I'm not a G6.

Scrap the current system. In 28 years I reckon 3 enquirers have asked my grade. I've had 6,6 ? 4,4,4 but from de-brief thought it should have been a 3.

The current grading system is good and fine - apart from the public not being very aware of the grades and what they mean. The vast majority of ADI's are the lowest grade (4) so most do not talk about it however the minority of ADI's that achieve the highest grade 6 and repeatedly do so don't particularly have any public recognition or notice of this. If any changes are made I would hope that the public is widely informed and that it really will help those of us that maintain the highest standard time after time. Maybe that the highest standard / grade be given a different name - descriptive of the standard compared to just a driving instructor

Grades 4,5 and 6 should be replace by one single grade to all the ADI's who are fully qualified.

Pass or fail

What we have now, very few members of the public understand it, it needs to be changed but has to be very carefully thought through first.

An easier structure would be great, for example 1-10 not 1-6.

As a Grade 6 ADI, my business benefits from the grading system, people chose me knowing of my high grade, and removing the grading structure will not give people the informed choice that they currently have.

however you do it make it known to the public

6 grades are better than 4 as they offer more discrimination.

As long as these are published for the general public to understand.

1 to 6 is too many□why not have 3□1 fail

It is hard enough as it is. It needs to be hard and a grade 6 is something to aspire to. The new grading structure is a bit demeaning.

would this be the same for fleet trainers as well?

a lot of pupils have no idea about the current system anyway so it would hopefully be clearer for them when booking instructor.

The current system is fit for purpose. Why change it?

Out of the 7 years i have been teaching, although i always inform parents as well as their child of our grading system, no-one seems to pay any attention to this. I do feel the higher the grade the more qualified you are, if your grade goes down then you know you need to improve on it, but how it effects our customers I do not think this has much of an impact. I personally believe in qualifications, the more you have the more quality the lesson, this should reflect in your grading too. How this could be re-structured im not too sure.

I think that you should take on board what the pupils actually think about their tuition and the way the instructor has undertaken there lessons, customer satisfaction. Also what their SE can contribute not just base it on a short check test that can be utterly nerve racking

Again you are not being clear about what exactly is being considered.□The current system is

strange, and also a little meaningless with many ADI's just happy to be a Grade 4 and muddle along. I have higher aspirations and want to be the best I can be but I am not sure what currently exists or is being proposed changes

The grading structure has been a source of irritation for years it seems. The rigid check test format makes no allowance for individual styles and abilities. I am a grade 4, yet nearly all my pupils have passed 1st time, and the two who did not passed second time, and they were my first two when I was brand new and inexperienced. I know I am at least a 5, if not a 6, yet your grade structure does not show this.

What is wrong at present? It's working ok. Offer ADI's additional training.

not sure of the value of the grading system to the public . would favour more of an internal system of supervision so ADI 's felt that they were being helped rather than tested

Complicating things??

Checktest grades often have little in common with an instructor's ability.

As quoted most of the general public would regard 1 as the better mark so why introduce a system that remains confusing?

An equivalence with the current scheme will need to be clear.

The general public have no awareness of the grading structure at present. Unless marketing was introduced this would be of no benefit.

The public need to be made more aware as to what the grading system means. I have never been asked for my grade by a pupil.

The current grading system is farcical. It is also being abused. An ADI is either Satisfactory or they are Not Satisfactory. That is all that is needed. It is also being used against ADIs when it comes to buying vehicle insurance for their school car(s). Most ADIs are interested in - can they teach for money to earn their living?

The standards check MUST reflect the type of lesson being delivered. Delivering development to qualified drivers is different to learners. It is clear the current check test has a great deal of difficulty with this. Many fleet trainers do not deliver lessons to learners, therefore an assessment requiring this would be just as artificial as role play

The consultation paper does not give enough details as to how a grade would be decided on so it is impossible to agree or disagree with this proposal.

i am presuming that this is something that needs further consultation as the proposed changes are fairly casual and without full explanation? surely, if the proposals are being made to bring the training and post qualification standards check in line with each other then it would make sense for the terminology and grading system to be the same as the vocational qualifications terminology and grading system. this seems like another reason for believing the cart has been put before the horse, as it is not until the A.O are properly involved that we have any idea of the grading system they intend to use

"Not acceptable" or "fully competent" seems fairer than numerical evaluation which can, in my experience demotivate. It also fits better with current educational processes.

The current grading system is farcical. It is also being abused. An ADI is either satisfactory or they are not satisfactory. That is all that is needed. It is also being used against ADIs when it comes to buying vehicle insurance for their school car(s). Most ADIs are interested in - can they teach for money to earn their living?

grading system should be just. qualified to teach driving . like other professions eg qualified doctors.. lawyers.. accountants.. etc

a simple pass or fail would be enough. In 13 years I have only been asked for my grade once

The current system is misused and misunderstood. it was originally an internal system to assess the priority to reassess ADIs.

It is the grade of a lesson, conducted once every 4 years, how can that be regarded as the grade of an ADI?

I can not understand what is confusing about the existing structure if i'm being honest. It is clearly written what each grade represents with an adequate grading scale. To change this seems like changing just for change. To propose a new scaling of 1-3 in my mind represents less clarity and detail of an instructors standard that from within a scaling of between 1-6.

The general public have no idea that there is a grading system. The simplest system would be a pass or fail one there doesn't need to be anything else.

Definitely need changing as the general public do not understand the system and as far as some are concerned grade 1 is the best with grade 6 been worst.

An ADI is either satisfactory or not satisfactory. Grades should be internal only and not published. Even insurance companies are now charging increased premiums for lower graded instructors. All an instructor wants is to be able to earn their living from teaching pupils. Pupils do not know about grades.

The grading is of limited value - a satisfactory/ not satisfactory result is adequate. The standards check provides a very limited snapshot of a trainer's performance, is not representative of normal training, and unnecessarily brings into question the uniformity and consistency of the examiner's assessment.

the existing system gives a target to achieve and strive for, there should be on demand and right of appeal added to the present grading structure

I could lose my grade in the period when/if the present system changes over so an equivalent descriptor structure could be based on the present system for continuity, for example, grades 1-3 (not competent), 4 (competent), 5 (good), 6 (excellent).

This will not make a great deal of difference has a great proportion the general public does not know anything about the grading system.

I don't think any grade is important I believe it becomes a competition in test centre's between Adi's and that is all. The current scheme is definitely not the way forward in my humble opinion.

For what purpose ? I am a grade 6 but so what no one has ever asked me my grade in 28 years!!!

I think if qualified and passing desired checks a grading is not necessary. if the rest is to standard this should be enough

Why change? It shows satisfactory, good and excellent instructors. 4-5-6 grades and I have worked hard for my grade 6.

do the public actually know what the current grading system is. so why change

we all understand the current grading system and there is no need for change in this area

I agree the Grading should reflect the scores on a standards check

Unless the wider public is made aware of standards or grading structure any change will have

little impact. I have never been asked by a member of the public to see my green badge or asked what my grade is. Most are simply unaware. As an individual ADI, during my introduction/meeting with a new student (sometimes involving parents) i always make them aware of my grade as well as broader qualifications and commitment to CPD

The current grading system has no practical validity other than to massage the egos of less than 6% of ADI's.

The document refers, in section 5.2, to ADI's who deliver Fleet training or other specialised services to local authorities who require the instructor to have obtained a higher grade in their check test. This assumption is more of a wish-list than a factual requirement given the small number of ADI's who hold the higher grades and small percentage of those who do undertake Fleet and specialist training.

There is no practical value or incentive for the ADI as the higher grades do not, as stand alone issues, bring an ADI more work or higher rates, and the great majority of pupils are unaware that such grades exist.

As the DSA has already moved away from testing ability in favour of the EU directive for compliance to standards, this would be a good opportunity to end the grading system. Ability can be graded; standards are either met or not met. This is all that should be measured.

Ministers, however, should keep in mind that once the EU directive allowing instructors from other EU countries to work in the UK without being subject to a standards check there could be, in principle, a legal challenge to the continuation of a standards check for UK instructors on the grounds of discrimination.

I'm saddened by this constant emotion-less notion of "Competency". □ Here's a classic example : the notion of "Top Grade" is now reduced to "Fully Competent" - no doubt completely politically correct, and who would dare gainsay that?

if its not broke dont mend it

As stated in the paper, the public don't understand the current system

I DON'T BELIEVE THAT THE GRADING STRUCTURE AS IT STANDS IS PARTICULARLY MISLEADING, I THINK THERE ARE OTHER MORE IMPORTANT ISSUES TO BE ADDRESSED.

ADI grades are misleading. Who looks for a grade 6 Maths Teacher or Pumber? They are either qualified or not. However striving for excellence should be encouraged and extra official

qualifications to enable an ADI to advertise as e.g. DSA ADI car 5 Star or DSA ADI car Gold Award etc would mean more to the public.

Scrap the grading system. A simple pass or fail should be sufficient. The public don't understand the grading system so it's pointless.

There must be a way for the public to tell how good their instructor is - perhaps a grading system such as --- A grade - (excellent) to F grade (Poor) or leave the system as it is - as long as there is a way to tell how good or bad the instructor is - this is really important when the instructor has had many years under their belt

Current system is fine.

Pass or fail. The grading system to the public is a nonsense. They think grade 5 or 6 is bad !!!

Pointless exercise. Only ADI's are interested in grades and if they don't understand the current system they need to look for another job!

I see no need for a change in the grading process as the grades are, realistically, only ever used internally.

The grading means little to those outside the industry anyway so why confuse things further

ADI Should not be graded As this is not a true reflection of an ADI's ability to give driving instruction.

As grade 4 is the lowest standard acceptable I have always failed to see the need for THREE SUBSTANDARD grades, where else does this happen? You are not good enough but hey carry on for now... up to a year.!!! Most ADIs do not fully understand the grade system and the public do not even know about it, so what is the point? I have only ever been asked about 5 times in almost 30 years, one of those by a 15 year old nephew over a dinner table.

I think the Grading structure is irrelevant. I have an excellent pass rate, 100% since Nov, but I was graded as a 4 on my last check test as I am "too soft". I know my pupils and how best to handle them.

Surely in this technological world test pass rates can be used to help grade ADIs

I am proud to say I hold a grade 6 and have worked and trained very hard to maintain this

standard.

Yes 3 tier system would be easier and simpler to understand, and in line with most educational and professional or technical organisations.

If the way ADIs are assessed changes, and a different set of criteria are formalised, the grading will automatically need to be reassessed. ☐ Currently the only people who are actually aware of ADI grading are ADIs and people in the industry. If the grading system is altered, I suspect that this will still be the case. ☐ I don't see WHAT the grading is called as being much of an issue. ☐ Current grading is a very negative process based on "number of faults spotted and corrected". With client centered tutoring, the measure of success is what has been learned that will improve the driver's safety or confidence. This sometimes means the instructor keeps the car safe, so the client can concentrate on learning a more important skill without having their confidence destroyed by criticising the faults rather than developing strengths. ☐ What a learner driver needs to know is whether their instructor is competent, and will give them the training to be a safe driver.

At present members of the public tend to understand that a grade 1 ADI would be the 'best'! However, the system at present, works backwards!

Agree the current check test doesn't really break down enough elements of strength and weakness, perhaps grading should be changed to higher numbers 100% rather than grade 6 which members of the public know nothing about or what it means

If it's not broken, why fix it? There is nothing wrong with the current system. LEAVE IT ALONE!!!!

I believe the current system is fair ☐ When we start using terms like competent as against excellent it can give a false impression when considering ability.

A simple satisfactory/ unsatisfactory result would be my preferred option.

Either I am good enough to teach, or I am not. End of story.

Why? The public do not, on the whole, know anything about the grading structure. All it proves, at the moment, is that you played the game well at your check test. Most instructors manipulate the system. If all the examinees are cheating, some better than others, the grade is largely irrelevant. Fix the exam and then work out how you are going to tell people. Of course, this will mean that adequate instructors will be overlooked in favour of excellent instructors, driving them out of business. We are NOT like teachers who as long as they are at least adequate remain in their jobs. Our reputation as instructors is our lifeblood and you are meddling with our reputations. Be careful!

Current grading structure is fine, why change something if it's not broken???

To many options will result in too many variances from examiner to examiner, test centre to test centre.

It would be more the way the grades are determined than the grades themselves which would concern me.

The grading structure is not understood outside the industry at all - users of instructors do not understand it, other than in industry oriented markets.

Excellent ☐ Very Good ☐ Good

Most pupils are really not that bothered as all they want to do is pass their test and generally go on word of mouth and whether they get on with the instructor or not. If anything I would say there are probably too many grades.

I support a move away from the 1-6 grades and would seek more a more open approach that was understood both by the industry and the public.

I want to see a clear way to show the effort an instructor puts into their lessons. I am not sure I would like to be reclassified from grade 6 to competent.

there is no problem with the tried and tested current system.

Grades should be scrapped and replaced with a simple pass/fail result. The current system has no benefit to anyone outside DSA, and the general public are not aware of it.

there isnt much wrong with the current grading system but I would say that i'm a grade 6. Its education of the public that don't know about the system that need promoting. Whats the point of changing something the general public know nothing about?

I believe that the grading system is wrong, it doesnt reflect on the everyday ability of an ADI, it brings unnecessary anxieties

It serves no practical purpose to change the grading structure as it is only the DSA and ADI's that it has any meaning for. In 15 years I have never been asked by a client for my grade.

the current system is too confusing

Scrap grades altogether

Current grading structure is easy to understand

It's not broken so don't fix it

Tinkering at the edges of a system that is unfit for purpose

It doesn't matter what system is used for grading if the public don't know what it means!
Replacing 1 to 6 with A to F or 1 to 3 is an exercise in futility it has no publicity or meaning.

The current system is flawed in that the public generally aren't aware of it (and even those that are often assume that grade 1 is the highest grade achievable). Having descriptors of some sort would negate the need for the Agency to spend time and money explaining the current confusing grading system if the DSA decided to keep it.

ADI's for the most part are baffled by the check test. Every time we get one the goalposts seem to change. Having an examiner who is not a practicing ADI, grade experienced ADI, is ludicrous. Only experienced ADI's can do this. We look on the check test as nothing more than an inconvenience. Our pass rates are proof of our competence not some test by a person that can't do our job in the front line of road safety. Sorry about the rant.

We **AGREE** that it should be considered. We would be interested in further discussions on this subject. We consider that it is important that the public understands the grading structure that is chosen as currently we don't believe that they do.

We would strongly support change. The grading structure currently has little recognition, so therefore relevance or value, to the consumer. A grading system which is a more obvious indication and endorsement of instructor quality and competence (to the general public) would be welcomed. As long as we have a system, which only instructors and the DSA understand, it holds little weight with the general public, and end customer.

We would be interested in **further discussion** on this subject.

Strongly agree. The current grading system is farcical. It is also being abused. An ADI is either satisfactory or they are not satisfactory. That is all that is needed. It is also being used against ADIs when it comes to buying vehicle insurance for their school car(s). It is also worth members of the public and indeed many driving instructors being aware that in order to examine an

instructor on a standards check test that the examiner only needs to score a grade 4 in role play to be qualified to conduct a check test. How can that examiner then be regarded as sufficiently knowledgeable to know what a grade 6 with a live pupil is?

DIDU has repeatedly asked the DSA to make available to the instructor being check tested the CV of the examiner conducting the test, in common with an ofstead examiner in a school visit. This should include the following information.

1. Has he ever been an ADI?
2. If so, how many years experience as a working ADI have they got and how long ago was it.
3. What grade were they when they joined the DSA.

The fact that the DSA refuse to give this information out is because they haven't got the confidence to do this which, in itself, speaks volumes as to their suitability to be even conducting check tests. It therefore follows that gradings are irrelevant.

Yes we would support changes to the structure

Feedback on question 18

If you agree that changes should be made, what would your preferred structure of grading be?

Grade A and B only .

All examiners must show grades as well as the badge in the windscreens

Three grades

1 grade (qualified)

ADI OR NOT

1 to 3 one being the highest, Two the standard and three unacceptable.

No grading at all , you are either pass the qualifying test and subsequent check test or not, if not you should not be permitted to instruct

Qualified or not qualified ADI.

Districition, Pass or Fail

A broader range of grades from 1 to 10 where 1 is the best, 10 is the worst. Grades 1 to 5 would be considered acceptable and 6to 10 where additional training/improvements are needed.

Making it clear to customers which grade is better - possibly making grade 1 or grade A the equivalent of a current grade 6

the current grades work but are not understood by the public, therefore a system showing satisfactory or not would benefit them.

Bad, Average, Above average,Good, very good.□ Easier for the public to understand

No grading. Pass or fail

Not stars. Pass rate, hours taken, standards check should all be considered. Ofsted's school rating would be good.

Grade by letters - Grade A highest - Grade D lowest. Do not show grades where and ADI has failed a check test

More grades

In line with the new standards test.

eliminate check tests completely go on test average results

Phrases which reflect level of competence which is meaningful to anyone reading them who is outside the industry, so any member of the public. Numerical grading is of internal value only.

Pass or fail

Rather than numbers be more clear without knowing what the numbers mean for example how schools are graded:

Outstanding

Excellent

Good

Acceptable

The customers will know straight away what standard the instructor is. Numbers mean nothing to them.

1 being the best and so on

No grading. I have over the years seen some very good grade 4 instructors who got nervous on the day and under performed whilst I have come across some grade 6 instructors who lack people skills, don't care about their clients and were lucky on the day. I have heard of some who rehearsed with their friend before doing their check test.

grades: A, B, C, D, Fail. ☐ With grade A being equivalent to the current grade 6

a simple number grade, maybe with 5 levels

Pass/Merit/Distinction

either to a high standard or a moderate standard which would indicate some shortcomings in the trainers ability with feedback as to how they could improve

Again. Is the current system 'broken'? Does it really need to change?

No grading necessary. Customers soon find out poor instructors

No Grading. ☐ Pass or fail for equality An ADI can either deliver training/lesson or cannot. It would make a much fairer system than the current system.

I would like to see ADI register includes Category C and D licence instruction.

Graded 1 to 4

I cannot see any problem with four worded grades.

Align it with the grading structure of the new standards check

1-10 etc

An alphabetical system where A was the top grade.

Descriptors

Class A Class B Class C

1 to 10 with 10 being the highest, as a Grade 6 doesn't sound high enough.

Abolished

Highest grade to be 1. As most people would think 1 is the highest.

A bit like degree courses, where not just test results count towards the overall grade. I would

think most paying pupils would like a true picture of the ADI's pass rates than his grade.

more grades other than 4,5,6. e.g. ADI grades 4-10

Grades 1 to 4, grade 5 must retake test, grade 6 kicked off

Anyone that is not Grade 4 or above cannot instruct at all. The lower Grade 4's must be coerced to improve their standard or be removed from the Register.

A letter based system with A being the best grade. Currently Grade 6 appears to the general public to be rather poor.

Grade 1 = high competency

The structure of grading should be based on the ability of the instructor to deliver useful knowledge and advice to the pupil regarding road safety and respect to other road users, not down to the manner of tuition, we are trying to teach them to drive, not pass exams..!

Over three assessments or two but not one I'm a bag of nerves what about a SE sitting in on a ADIs pupils test then they could see the standard if it was nerves or lack of proper training

0-3 stars

CPD should be recognised. Whatever the wording around the "Top Grades" for ADIs, no-one should reach that level unless they have evidence of CPD commitment.

Grading should be the other way around. 1 being the highest and 6 being the lowest.

A B C D E

Overall the work that is done in the industry should be taken into account. Whether in classrooms or car. The qualifications that an ADI has attained. □ If a total grade is given then it should be on the whole.

No grading just qualified as all other professions are.

A - top grade, F - bottom grade

Pass or Fail but if failed you must be given a period of time to improve and be retested prior to removal from register.

See last comment. Also check test grading for ADI's could be done just 1 -3....1 being the highest grade where ADI is near perfect or by the book however being realistic, grade 2 would be

Use descriptors

here should only be ONE grade "ADI" as all instructors are either acceptable or not to the DSA to teach driving skills.

There should be no grades, just pass or fail, this will remove lots of problems among instructor and get rid of the problem of pupils asking 'what grade instructor will it be' We cannot all be grade 6

That the level of grading reflects the standard of ☐ and known reputation of that instructor

The problem with any system is it is one persons opinion. An ADI could get a grade six with one Examiner but a grade four with another.

1 should be the highest grade. ☐ 4 should be the lowest

I think grading should be based purely on pupil test results ie. and ADI who is consistently obtaining passes with very few minors should be graded higher than an ADI who is getting passes but with a consistently high level of minors.

I think a 3 level structure is too narrow as it is likely that SEs will be reluctant to award the top level thus having many in the middle, I think the highest level should have 2 tiers, maybe a 'with distinction'.

By way of descriptions. ☐ Pass rates should also be part of the grading system

Fail, Pass, Good and excellent.

A down to F

1 to 6. 1 needs to be the highest. Current grade 6 fails to convey to the public what level this

number represents.

In words

No to government grading. Yes to industry grading

pass or fail

. Excellent Instructional Techniques

The highest grade should be "Grade 1".

I believe that the current grading system can be misleading. Competency develops with experience, rather than within a role playing exam. A single standard should be awarded with vocational training. Other wise we have a system which knowingly allows pupils to be trained by adis of differing abilities. This is unfair, surely.

Descriptors instead of numbers

Outstanding, very good, good.

grade 6 change to grade 1

No grading required. The real test of quality is customer satisfaction and the retention of pupils. Good ADI's will survive this increasingly difficult vocation, bad ADI's will falter,

Grades A, B, and C to be acceptable. D and E to be unsatisfactory. As per GCSE qualifications.

I think descriptive as changing the numbers would make current Grade 6's look like they've dropped a standard or two. However, a descriptor for a Grade 6 needs to be more than just 'fully competent' which describes a Grade 5 better.

not sure

No great requirement for a grading at all, no body but instructors care or ask

Poor, fair, good, very good.

no idea at this moment

satisfactory or unsatisfactory

I would expect 1 to be highest grade.

Satisfactory, good, excellent

First class, second class, third class, ungraded

No grading. Simply pass or fail

Descriptoors

A worded grading would be clearer.

A more frequent test whatever grade you are. Once a year

0-4 as stated in consultation.

abc

From non competent to competent. There needs only to be 2 tiers. There is either competence of there isn't... Fully competent??? What does that mean????

1 to be the highest grade.

0/01/2013

Normally a grading of one or 'A' stands for an high qualification, and the higher the number or letter the lower the grading. Make the current 1-3 obsolete and if a grading is not achieved then it is not given, or just have one grading given for below achievement.

What's the point in grading... The public are totally unaware that it exists and it does not affect how much can ve charged

Pass or fail

ABCDE all acceptable, sub standard U

I feel the grading should show a system that the general public also understand some thing like corgi gas system.

The grading should be satisfactory or not satisfactory. There should be no need to grade an ADI with numbers as mentioned it has been confusing and the general public do not understand the grading, nor possible care as it may be down to cost of lessons rather than a good graded instructor.

A simple Yes / No grade. E.g. Competent. Not Competent. And an option for examiners comments for improvements. Any inbetween grades add unnecessary complications for grading and create confusion for customers.

No grading at all. completely unnecessary as most ADIs are self employed the better ones tend to build their own business and reputation which speaks for itself.

A,B,C, etc

1 being lowest and 10 being highest etc

Yes.

No grading required

1 - 4 is fine rather than the descriptors

worded, ie Excellent, very good, poor

descriptors linked to 4 grades

a,b,c,d. D being unsatisfactory

1 being the highest grade upwards.

I think the grading structure could be changed and should be based more on coaching and how the ADI is transferring his or her knowledge to the candidate. ADI's should drive how they teach

and teach how they drive.

grade 1 equal to grade 5 and 6 covered all topics above required standard

grade 2 equal to grade 4 covered all topics satisfactorily but further on going training recommended not compulsory

Grade 3 equal to grade 1,2or 3 Unsatisfactory further training compulsory and a time limit imposed for second check test

educational and the three attempts remain

Descriptors

Numbers 1 to 5 choosing either 1 or 5 to be the best makes no difference but most things are five starred these days. Having six grades is a bit strange and no one really ever gets a 1 or 2 anyway so mingling these together is fine I think.

1 to 10

basic 123 or abc .

Make it more difficult to become a driver instructor.

1 is top down to 3 which would be barely acceptable

Perhaps like the educational system four tier; from fail to excellent with the three acceptable levels leading to opportunities for improvement

A to D grade

A pass or fail

Grade 1 (excellent)

It is difficult to say, as grades of instructors and pass rates of test centres have no relationship whatsoever

Number 1 being the highest as it is in every other walk of life. Grade 1,2 and 3 seems fairly

pointless, as they are all below the standard required to be allowed to teach. Also the the grading system need to be more publicized to the general public. I am a grade 6, and it the nearly 14 years I have been on the register I can count the amount of times I have been asked my grade by a new customer on two hands.

I find the grading system to be misleading in that it doesn't actually reflect the true abilities of the ADI and for it to be valid, it has to be tested in some way (the output). It's like saying, "if this ADI is a grade 6, then he/she SHOULD be an excellent ADI" and it's left at that. A snapshot of one's work in an hour. I think the grading, if there has to be a grading, must also reflect CPD.

A fully competent grade as the top grade down to unsatisfactory as the lowest grade, with 2 grades in between.

A (excellent) to E (poor)

Competent or Non competent

6 low to 1 highest

Unsatisfactory, satisfactory, outstanding

I still think a numbered grading system would be better, with the lower number being the best. If a description was used this would probably not have any meaning in the real world, and may not be clear to a potential client what grade their instructor is.

EXCELLENT, VERY GOOD, GOOD, POOR, DANGEROUS.

Removal of grading system as it stands and replaced by a "Competent" " Not competent" grading

Possible A - F

I would need more time to think about how I would restructure so it would be more efficient

I think there should be more than 4 grades. There is little there to differentiate instructors. There are three key area's to the new test. The max score is 51. There is scope for banding.

Standards check

Pass - Fail? If you insist on a grading why change? It is not that complicated?

1 being the highest

Reverse the grading numbers and examiners need to remember that pupils as well as the ADI will be nervous and not react as they usually do on lessons

Words such as acceptable, good, very good

Grade 1 High, Grade 2 Medium, Grade 3 Satisfactory, Grade 4 Sub Standard.

Wording rather than numerical

Excellent, Competent, Below Standard

1 - Fail ☐ 2 - Pass ☐ 3 - Merit ☐ 4 - Distinction

I like your proposed idea, most of the younger end of instructors use coaching which is the way forward

1 = Highest Grade ☐ 6 = Lowest

If a new standards check is introduced then all ADI's should be checked every 12 to 18 months and if successful a competence to instruct certificate issued and the grading system got rid of all together.

Nvq

Use of descriptors

Use of descriptors as per the standards check form, rather than numbers.

year 1 no standards check , educational check attend a course - grade 5 , then as you progress and attend more courses then increase your grade to grade 1 instructor

the suggestions for change are fine, it would make it easier

Good ADI ☐ Very good ADI ☐ Excellent ADI

3 grades

Wordings eg Very Good, Good etc

Enhance current Route (option 2)

A, B, C etc A being the highest

no one but a adi can understand it now

It is not the structure that is the issue - but the means of attaining that structure which is the problem.

Pass or fail

unsure, so long as practice is made safer, for public protection

Simple format easy for public to understand

As set out in th standards check

1 top to 4 lower

It should be based on test results then you will stop the poor quality instructor taking clients to test not safe or ready.

Four grades is fine with details of what they mean.

No grading system. An ADI is qualified and, IMO, grades do not accurately reflect the everyday lessons of an ADI, and, just like the practical driving test, penalises those who suffer badly with exam nerves. Some ADIs who receive poor results on checktest / standards check may otherwise be an excellent instructor. Also, in over ten years I have NEVER been asked my grade by a pupil.

Highest grade to be grade 1

Grading should be pass or fail, check tests should be used to help ADIs in their weak areas to help improve standard. Grading is irrelevant to ability.

Coloured ADI badges ie top grade different colour to the next grade and another colour for a competent ADI that way the public can see for themselves.

not shore

Outstanding, Good, Requires Improvement, Inadequate. Same as Ofsted.

Sadly it makes no difference, as it depends on how well you perform when the pupil doesn't drive as they normally would.

clear descriptors such as "fully competent"

Words- Fail, pass, outstanding etc...

Pass or Fail no complicated number structures. □As sometimes ADI's with lower number grades make better instructors.

A TO E . A BEING HIGHEST

Only a pass grade

Acceptable or unacceptable. A simple pass or fail.

also based on test results

descriptors are more helpful if you want to make things clearer about what a grade means.

I remain to be convinced that CCL is a critical element of the pupil learning process. Any descriptors should be flexible whilst giving an accurate assessment as to the ADI's capabilities shown. Where the ADI has shown to be capable, a positive message should be given through the structure

Simpler grading scheme.

GRADE 1=====GRADE 2=====GRADE 3=====AND NEED TO RETRAIN TO REACH AT

LEAST THE LOWER GRADE BEFOR TEACHING

Not competent ☐ Deferred, will be checked again very soon after further training. ☐ Competent

Grade A B C (to replace Grade 6, 5, 4 respectively ie. Grade A is the highest, Grade C is a 'pass').

Grade D to denote an instructor who has failed to meet the required standards.

Good; acceptable; room for improvement

the same grading is oka

Grade the ADI on his or her pass rate with a minimum grade of 4, 4 being a 50% pass rate over all.

We would want to discuss this at meetings with the DSA. It must be clearly understood by all interested parties and explanatory text supplied.

There are various structures utilised in other professions, which could work well in driver training – a simplified system that the public could more easily recognise, understand and value is absolutely necessary. Various educational grading frameworks used in other academic and vocational areas could be considered.

We would welcome further discussion on this subject where we could evaluate several examples of existing grading structures from other occupational areas, and see if they improve on the current system in the eyes of the user (both customer and instructor). With access to thousands of instructors, their pupils and parents, we would be very happy to carry out some simple research with both members and their customers.

We would be interested in **further discussion** on this subject.

Satisfactory or Not satisfactory - Grading should remain an internal piece of data and should NOT be made public. The public have no idea about the current grading system as it is and less than 1% of pupils ask for the ADI grade. An ADI is suitably competent in accordance with the current regulations or they are not. It IS that simple.

Our preferred option would be a simple “Competent / Not Competent” rating. The main reason for proposing this is that the current system doesn’t really help customers make an informed decision over which ADI to use as they do not really understand the current grading system.

Also, there can be inconsistencies in the grades awarded by examiners so it doesn't offer a level playing field for all instructors. If this proposal was not adopted, we would prefer a descriptive system similar to the NVQ Levels 1-5 system with Level 3 as the minimum standard required.

Feedback on question 19

We are looking to improve the general information that is available to learners and parents about choosing an ADI (paragraphs 109 - 112). What information about ADIs do you think it would be useful and fair for DSA to make available to potential consumers?

name and post code

Everything.....Pass rates Complaints..... ETC

Similar to registered trades and should take into account the gradings as in Q17 Also whether CRB has been done

there should be no information as such, just to confirm that a particular person is on the register would be enough

PHONE NUMBERS ONLY

Length of time as an ADI ☐ Area that they live in. ☐ Male or Female Gender.

An understandable published grade, published pass rate (ie at test centres and on line).

Certainly not check test grade for the reasons given in previous section. Some very good ADIs are grade 4, some quite average ones get a grade 6! Items. Likewise test pass rates do not show how good an ADI is - many specialise in learning difficulties, people who are very nervous/older. I would include only what is already available.

No information this should not be in the domain of the DSA

time in job ☐ grade ☐ cpd

Areas covered. Pass rates do not give a true reflection of teaching ability. I often get disabled and mental problem pupils who do not respond well to tests, hence might take more than 1 test.

publish their skill levels achieved when they qualify. Make it plain who is trainee who is fully qualified. Make it plain who is working through a school or as an independent.

Current Grade, previous Grade incl. any period when they were sub-standard, length of time qualified.

If they specialise with nervous pupils, certain disabilities, the car they use

grade, passrate, number of tests, length of qualification.

Experience, Full or trainee, Grading on the condition that instructors could take a standards check when ever they wanted and not as it is when the DSA choose

There are too many errors in the Dsa information for it be released to the public. It is meaningless in its current form.

a lot of parent don't really care except about passing as quick as possible so they do have to ferry their children around not safety. years ago in this area we had an instructor who was an old famous pop star and he was first choice for lesson because of his fame.this help him pick and choose his pupils and only taught young and easy to teach gaining a great pass rate and increasing his reputation until the recession came in and he had to teach everyone but would move pupils a side when the easy pupils came along. this would happen in a big way today.word of mouth is still the best way not statistic that mean nothing.

Name and Number, how long been Qualified, servicess eg pass plus

I think the more that we provide to potential learners and their parents is essential, but I would prefer that only recognised qualifications go onto this that are related to the job that we are doing. Rather than just saying I am good at dealing with nervous drivers etc.

name

Complaints, have hey got any against them. Pass rate, even though it isn't a good indicator.Grade, whatever it maybe.

Not many customers are a where of the ADI grading structure - make this more clear.

Check test grade. Pass rates would not , in lots of cases, be an accurate indicator of instructor competence due to demographic split etc. some of us are known to be more patient with nervous pupils for instance so get more of them. It would be unfair to publish pass rates if these pupils who can drive competently normally, fall apart under test. There is also the question of unscrupulous instructors taking people out forever then refusing to take then for test

Additional qualifications pertinent to nature of work, eg RoSPA , PTTLS, DIPDI, etc

All, should be nothing hidden, and why should there be.

All external qualifications above and beyond ADI registration and years of experience. I would be wary of pass rates and number going for test due to the amount of ADIs who no longer work with learners or take people with SEN for test.

Grading if it is meaningful; Specialities offered by the ADI; Other qualifications that are relevant, eg teaching and coaching qualifications; advanced driving Definitely NOT pass rates. This is a very crude measure of an instructor's ability and creates a culture of teaching to the test and avoiding teaching those who struggle to pass, through nerves for example.

Nothing. Pupils or parents should select ADI's using their local knowledge, costs and attitude of instructor.

Grading

How long established, temperament, grade, other qualifications

I think ADI's being able to list their additional qualifications could be good as this might encourage more ADI's into doing more CPD

list all external but appropriate qualifications, e.g. IAM, RoSPA, Fleet, HGV, PSV, motorcycle, 4x4, Police class 1, ARDS, etc, etc,

Grading would help, but only if the public understand the grading. Test pass statistics won't help as they vary for each centre.

instructors grades available to view, this would be a way of making instructors take CPD

Years of experience, and grade.

none under the data pro act

What additional training the adi has undertaken and their experience in the industry including how long they have been qualified as an ADI

Are consumers really that interested? Sorry, but for all the discussions you can have with a prospective student, it mostly comes down to 'how much? '

Virtually none. I assume you are referring to statistical data - we all know what statistics are...

learners choose based on recommendation, parents choose based on learners choice. There is nothing that could be published that would sway public choice one way or the other, it also leads to discrimination of ADI's if data is published.

Experience, Check test grade

Grade, □ Year in Business

to show what their up to date qualifications are

Parents and learners choose an ADI often by recommendation, or on price. Is DSA going to start recommending? □ The publication of any data MUST only be with permission Data protection forbids publication of personal information without permission of the data owner,

I see this area as problematic. If success rates were published for example, it may put instructors off teaching some groups of learners identified as 'more difficult'.

No amount of driving qualifications will encourage a parent to go with any particular ADI. Most go for the price of the lessons.

DSA should make it clear that any ADI on the register has met an acceptable standard & that choice of ADI is personal preference. Should then only state name, geographic location, contact details &, if they cater for special needs, what those areas are (e.g. deaf, physical disability requiring hand controls, etc)

Experience □ Constant updating of teaching /coaching methods etc

Instructor Grade & pass rate (where historical pass rate has been verified with Instructor)

Grade and time on register

all information relating to their moral/ professional conduct and any breach of ethics or breaking of dsa code of conduct. don't think customers would be interested in their grade or pass rate. but

i would be quite happy for that to be made available.

none

Nothing! If you're good at your job, word of mouth is by far the best way for an instructor to ensure he does a good job to a very high standard. See also my comment in 16.

Grade and average pupil pass rates

None. Pass rates are irrelevant as pupils are so varied. ADI's provide a service - the private sector in general relies on positive comments, recommendation and advertising: so should ADI's. Good ADI's can point to previous happy customers for referral - the DSA has no place in this regard.

I don't see that anything other than being registered is relevant. All of my work comes through recommendation, which speaks volumes yet many of my students take their tests in their own cars due to my lack of availability for other reasons. Any published information and stats can be refuted, wrong or misleading. Grades are not always accurate as some instructors under-perform on check test, others can 'play the game' for 60 minutes and I've found the check testers to vary significantly.

Length of service, grade, local address.

ADI Grade

Pass rate, 1st time pass rate, DSA grading.

Don't know

This is a difficult area as stats can be twisted. ADI grading should be made available with an explanation of the the grading system. Pass rates might not truly reflect the ADI's performance as Automatic's have lower pass rates, and this might lead to ADI's "dumping" learners who they feel will bring down their overall pass rates. Plus some examiners don't complete the ADI information on the test forms at the end of the tests so the information isn't accurate.

Their ADI number, pass rates , types of instruction ie manual or automatic etc maybe even the cars they teach in would be useful including ages of cars.

grade

Keep the same

Length of time that instructor has been qualified

Instructor Grade

"What is your pass rate" is second most frequently asked by my pupils. Unfortunately "how much do you charge" is the most frequent. DSA should highlight the fact low cost intro lessons are not necessarily the cheapest or best overall option as good ADI's can get pupils to test standard with higher quality and fewer lessons. The big adverts shouting 10 hours for £99 can be very misleading and usually result in that loss leader ending up far more expensive and take far longer than expected.

Grade, experience and pass rate

Display the ADI grade

pass rates can be misleading. I have a good pass rate but do not teach many people with learning difficulties etc. People who do teach such pupils would probably have a much lower pass rate but this would not be a true reflection of their teaching ability.

how long qualified, any complaints,

Only contact details and services offered, anything else is open to doctoring to create an unfair advantage.

none, people should be able to do own research without government bodies intervention

Qualifications. Experience. Longevity as an ADI.

Apart from the usual name and address, contact details, area in which ADI operates, -- length of held licence, areas of licence use i.e. 1 plate, fleet, mobility etc., and grade.

Grade and qualified for how long

That they are professionals and all of different abilities and that price is not the best way to differentiate between them.

As I believe the present grading system to be unfair I do not think that an instructor's grade should be made available. The general public do not understand the concept properly..! And may I add that it is not sour grapes...as I am myself graded 5..! Most people appreciate this I believe, that is why, in over 7 years of teaching I have only ever been asked for my DSA grade on 2 occasions..! Pass rates do not reflect an instructor's ability either, as this can lead to a distorted view by some people, the pupil takes the test, not the instructor..! The only information I believe would be useful to the public is the areas covered by an instructor (geographically), their personal contact details, and any personal references from past pupils, whether good or bad..!

so many ADI's refuse to make public their info you need to ask why . With fraud and ID theft cited often as the main reason are you wasting your time

Just be open and honest too meny ADIs saying they have a 100% pass rate and that's not realistic we should have nothing to hide we need to be transparent

None

As much as possible, including Check Test information

Location pass rate and grade

CPD

Name and address and telephone number

Not pass rates as this would lead to some pupils being dis-guarded, not grades as this would affect the afore mentioned grade fours being overlooked when they are exactly what some pupils need

Approved qualifications of training courses that an ADIs has gone on to develop their skills. ☐ I think pass marks will lose sight of what is the aims are. My pass mark is very good and I wouldn't mind it being published however this could be unfair advantage and not a true representation of the ADIs training styles or attitudes to the job.

Registration details and number of check tests taken. CRB checks.

Length of time they have been qualified.

Any information would benefit them,,,,,general questions I get are...price....grade....car type..years of experience...pass rate for 1st time tests....how many hours they may take...

Name, Phone No: Grade

All instructors have achieved a new high standard

Experience and gradings achieved.

Only statistical information that can be proved can be available.

An on line data base for pupils to complete directly to the DSA with any complaints about instructors would be useful in terms of the DSA checking the professional approach of some instructors.

ADI's SHOULD BE GIVEN THE CHOICE OF DISCLOSING THEIR PASS RATES eg THEY WOULD TICK A BOX ALLOWING DSA TO MAKE THEIR PASS RATES VISIBLE. THOSE THAT WANT TO WITHOLD THAT INFO MAY DO SO BY NOT TICKING BOX.

Very difficult subject - if you publish just grade you unfairly bias against the new ADI who has perhaps entered at grade 4 and who will be assumed to be a worse instructor, when in fact that instructor's performance may be exceptional when it comes to real pupils.

The ADI website, if they have one. ☐ If the ADI has an impartial site where former pupils write reviews the ADI should forward the info to the DSA - ADI's with genuine Good reviews would be a more reliable trainer. ☐ Information of how many tests were booked by ADI's and from those how many were a Pass or a Fail.

The Grade only - other things are too dependent on the pupils one gets. The number of hours on average given pre test etc

Their grade and pass rates

It will make little difference, most people are only interested in costs, qualifications are very secondary.

criminal records

Check Test grade.

Def not grades. A nervous instructor under pressure of being checked may not perform at normal levels. It is my experience of other local instructors that they certainly perform at well below their dsa grading

Yes definitely a good idea to advise public on instructors grades.

How many years on register. ☐ Average number of faults on test over 12 month period (not passes as sometimes a pupil will fail and have just 1 serious fault. But having average number of faults will encourage all instructors to have pupil to a very high standard)

Grade and ask previous pupils about the instructor, surely pupils must have the best opinions regarding the instructor who taught them

Contact details

What information does the government give patients about their GP? ADI's who deliver poor service will go out of business. Leave market forces to sort the wheat from the chaff. No to too much interference.

none

As long as it doesn't include Grade or Pass Rates. The former will encourage instructors to look for ways to cheat and negate the purpose of a standards test. Additionally, it will disadvantage those who don't deal too well in exam situations, who's pupil doesn't respond well to having a DSA examiner in the car or where things don't go as well as they would otherwise (e.g. getting a 4 instead of a 5). The latter is effectively encouraging discrimination as many instructors will turn away special needs pupils or, even worse, not let pupils take tests and effectively force them to look elsewhere after spending a lot of money with an

instructor, especially those with special needs even if that person is to the required standard, since there is a likelihood that they won't pass first time.

Difficult one. Customers at present just look at recommendations and cost. However the DIA, for example, list all the trainers qualifications, which if adopted by the DSA could allow Instructors to be more professionally competitive, rather than trying to lure pupils through price reduction, which unfortunately an awful lot of instructors do.

Publish their pass rate over a rolling average of their last fifty tests.

ADI or PDI. CPD

People should go by word of mouth, pupil satisfaction is the best recommendation.

Grade. ☐ Gender. ☐ Age.

Information that allows the consumer to report any irregularities with their adi.

Grading and pass rates

Pass rates, CPD qualifications,

LENGTH OF TIME REGISTERED ☐ GRADE NUMBER (BUT NOT A DESCRIPTOR)

Grades are given on 1 hour check test which from experience I know do not always go well on the day. ☐ So do not publish grades but make them more aware of the licence we have and what is required to attain it.

I do not feel it is the job of the DSA to recommend ADI's to pupils and I certainly disagree with the DSA discouraging the engagement of particular ADI's. NO information on ADI's should be disclosed, it is unfair and I would consider this as an invasion of privacy.

pass rates

ADI grades might be good to publish. It would help explain to the public that there are different qualities of ADI's and discourage people from only asking 'how much do you charge'. They could now see that better ADI's exist and that we are not all the same. It would make it much easier to justify for example, why my prices are higher than another (Grade 4) ADI in the area.

Years qualified, passes gained.

Name (mandatory)

Address (detailed optional, county mandatory)

Contact details (optional)

Para 110 gives the example of supporting very nervous learners - the DSA has no knowledge of or way of verifying such specialisms.

I DO NOT AGREE WITH REVEALING THE TEST PASSES OR FAILURE OF A NY DRIVING INSTRUCTOR AS SOMETIMES DOES NOT REFLECT THE TRUE PICTURE TO THE GENERAL PUBLIC

there would be no useful info for pupils or parents they will go with recommendations

Extra qualifications, experience of the ADI. The DSA could give the candidates opportunity to give feed back on the instructor through the website.

I do not think DSA should influence parent or learner decision; it is a commercial field. But, poor instructors should find it more difficult to continue trading through standards checking by DSA & be more readily removed from the ADI register.

There CRB record ☐ They Do CPD ☐ There Pass Rate

Grade, what specialities the instructor can offer, do not include test pass % as these can be misleading, an instructor who has 1 test pass a year has 100% pass rate, while an instructor who has 100 tests in a year and 50 passes has a 50% pass rate

Name/ Areas covered/ Contact details including website/Type of tuition offered

Name, Grade, Area Covered, Cost, Car Details, Contact Details

Name; email; telephone number; qualifications; whether partaking in CPD;

Instructors grade

Specialist areas (teaching those with learning difficulties, the deaf etc)

E mail address could be made available to the public together with instructors grades.

Length of time qualified. ☐ Any reports or complaints received by DSA which are a) pending or b) resolved only shown if ADI was found guilty of something.

Making the grading available is unfair as I don't believe it is necessarily representative of an

instructors ability, especially as it is only a one hour snapshot of a single lesson. This would also lead to a two tier pricing system. As a franchisee with a grade 5, pupils would naturally request a higher grade when calling the company and grade 4 instructors would need to charge less for pupil supply. I would also have to charge less than a grade 6 ADI. Any information which may adversely reflect on an ADI's business or reputation should only be made available if permitted by that ADI. My business or ability shouldn't be misrepresented through a grading system or by other statistics. If for example, pass rates were published, I would no longer teach nervous pupils or charge more for older pupils who have a lower pass rate. I would also be very reluctant to allow anyone except a perfect driver to be presented for test if their possible fail affected my business, I also enjoy teaching learners and do not wish to specialise or move onto other fields such as DIT or advanced driving. This does not reflect my ability or skills and would have to be reflected as such.

Here there is a difficulty; the public perception is that they are after a quick route to gaining a UK driving licence as cheaply as possible. Quality of teaching seems to be secondary

Organisation memberships. Time as ADI If pass rate disclosed then should make reference to several years evidence, number of students presented for test who pass first time, second time etc...

There grade especially comes first yes there will be lower grading Instructors that think this is unfair then they should get out there and improve .

Grade Additional qualifications over and above ADI Technical qualifications

Information to the public has to be 100% accurate. Can DSA guarantee this

blood type

I don't think the DSA have any information which would help, except perhaps, the length of registration. Pass rates, grades etc are too variable for many reasons. I don't see why the DSA should need to get directly involved in the market. Most people rely on word or mouth, which is all about an ADIs reputation - surely the best form of keeping standards up.

Im not interested in what the public think of ADI's as I only carry out fleet training. What are you proposing regarding the high accident rate of the company vehicle driver as to me the emphasis is yet again on the young driver!!! Re TRAINING ever 10 years when photos are resubmitted is the answer not constant testing and tinkering with things that just cost money to implement

Only their names and addresses.

Pass rates and number of tests undertaken, PROVIDED these are supplied to the ADI prior to publication in order that their accuracy can be verified.

Grade□Years of being an ADI□Area covered

Whilst we have Grade 5 & 4 ADI's which is excellent and would look good in an online list, we unanimously agree that to publish the grade would be unfair. Some ADI's prep pupils before a check test, change their usual style for a check test and have poor driving and teaching habits in general, however, during their 1hr check test, they could pass with a 5 or 6. Therefore, we believe this should not be published as planned.

Past and present training□Area covered□Type of vehicle

i don't think that any of that information should be given out..as we all know that pupils are on recommendation

Decent , honest and fully qualified

Pass rates□Cost

Pupils tend to choose an adi by recommendation or price... I can't see what else can be made available to help. Pass rates mean very little

Contact details plus percentage pass rate

I would provide name locations covered contact information web links to their site if they have further qualifications and what cpd has been completed could also include grade. I would not include pass rates as I do not think these always show the caliber of the instructor as some instructors are known to hold people back from test so may have a great pass rate but others may specialise in special needs training or just nervous learners therefore their rate may be far lower yet be much better instructors.

Grades plus pass rates

ADIs can promote themselves - there is no system that can allow for specialisms by comparing instructors - unfair on new instructors too

Time in the job and also when they were last assessed so that potential customers could be

assured that the ADI has recently been checked to make sure their teaching is up to standard

just contact details Any further info to be voluntary as can be complex

Instructor grade.

None, bar whether they are qualified and competent. □ Para 110 refers to extra information e.g. teaching very nervous learners - - I ask which ADI out there will not say they can do this. In practice there is very little differentiation in product offering by ADIs beyond manual/auto/adapted vehicle. □ One option could be to allow customers to 'rate' their instructor and provide comments - similar to 'trip advisor' system.

Just to confirm that they are a qualified ADI, which would be supported by their green badge.

No additional info than at present.

any other qualifications regarding teaching, specialised areas of teaching i.e. disabilities, advanced driving etc.

qualifications □ experience □ reviews

evidence of cpd

I do not believe this is fair and workable

Pass Rates together with amount of tests passed. Published when over 50 candidates presented to test.

Grade

The length of time on the register, their grade, specialism and services offered.

not in its current state, many members of the public see a high number, ie G6 as poor and a lower number as better ie G1 = 1st

ADIs should have the option of selecting from a list - some are not trading and would not want to be contacted

Grade, years on register, other relevant qualifications.

the information available now is sufficient. anymore would be unfair.

Grading, how long been on the register,

Grade and pass rate.

Qualification ie IAM /ROSPA/ and ordit or similar

All information – providing it is evidenced information

all adi should be put on to aweb site and then people like my self can look at an instructor and see if they are fulliy qulifired or not and it should apply tp those who are disabled and those on benefits and who look after a disabled person

Not a pass rates system as some of us take special needs or learning difficulties pupils to test and that's not fair to the ADI's that will then only pick the "best" learners to teach to keep up rates. Maybe a list of qualifications? At the end of the day the good ADIs are busy through word of mouth and the poor ones always moan they are quiet so nothing will change really. The good instructors will last always and pupils vote with their feet all of the time and always will

Recommendations. ☐Attitude☐Flexibility

poularity - ask for referrals . grade , area - who is most local , are ADI's members of associations or do CPD .

Grading to be displayed on the BADGE facing out.

IMPORTANT. ☐There should be an online search button where you can type the driver instructor's name and it will show their driver instructor certificate and face! This is to prevent fake driver instructors with fake ADI licenses teaching people.

there first time pass rate the descending standard

Parents and learners only look for the cheapest driving school. They neither understand nor appreciate the process instructors have gone through or their costs. ☐They strongly believe they can do the job themselves - driving instructors are not respected for their work - like teachers.

Grade and length of service

Length of time qualified.

Possibly you should be able to see how many pupils an adi had taken for test in the previous 12 months but not a pass rate

Services provided and contact details.

Time served as an ADI, experience of learner types from disabilities to SEN. Qualified teacher (PGCE, Cert ed) PTLLS, DTLLS etc. CRB and when, other qualifications and other work.

current grade, pass results as a percentage and years of experience

Length of time as an ADI, grade and date of last Standards Check, relevant qualifications, signed up to Code of Conduct

Skills and qualifications and CPD (make instructors update... the more they update the more business the get) They can only update if they've done the CPD in the first place.

General area of operation, pass rate, ethnicity, relevant past history and qualifications.

A register where pupils/parents have access to instructors recommendations from past pupils. ☐these should be acquired by the dsa/vosa by way of contacting new drivers when thier new full licence is sent to them. ☐This would make the system fair and avoid abuse

Number of years qualified. ☐Grade (with explanation) Till now it has been self-defeating to advertise that you are grade 6 , as only proffessionals understand it to be good. (thanks DSA)

Name of instructor ☐Driving school that instructor works with ☐Contact telephone number

the length of time on the register. check test grade

Pass Rates,

Only the grade. The pass rate is both confusing and meaningless. The only pass rate that is relevant to me is from my last statistically significant number of pupils (e.g. the last 30-50 of them), and even that can be pulled down by one or two serial failers. There is a major risk of

DSA data being inaccurate or misinterpreted, and causing serious damage to the business of an ADI.

Experience ☐ Qualifications ☐ Passing rates ☐ Skills

Time as an instructor, whether they have agreed to the code of conduct

This involves the DSA in a difficult area, e.g. Nervous drivers, there would be very little benefit as an individual ADI could say this but not necessarily deliver appropriate teaching. The find your nearest instructor is adequate.

Time as an ADI ☐ Pass rate (gathered from test centre data) ☐ I strongly believe that ADI grades should NOT be made public. This grade is the equivalent of an employees annual appraisal....this information should remain private....unless an ADI wants to make it public.

Why tis Q.18: it would appear that whoever in Government writes this stuff doesn't know much about how an ADI is 'chosen' in general. Personality cannot be legislated or prescribed.

Grade and qualifications. I don't believe in pass rates, as this can be heavily influenced be the candidates you have. For example you can have one individual that fails many times simply due to nerves, and this can drag statistics down.

If no. of test passes was used this would disadvantage those part time instructors who don't take many tests or those who only do Pass plus or retraining of full licence holders, or those on a break from teaching who still uphold their check tests.

Unless it is true and accurate and reflective of the whole gamut of the ADI's abilities and qualities, then phone number and last CPD Attendance date. ☐ Pass rates, grading, experience are all misleading to the public.

Our grades should be published, together with the date we were first accepted onto the register. ☐ Pass rates should not be published as there are many factors that affect that, and what is meant by 'pass rate'

grades are irrelevant with the current system, as are pass rates. Word of Mouth is the best for obvious reasons and if an ADI has shown to provide poor lessons, they should be removed in a swifter process and leaving a smaller, better source of ADI.

Their grade

Qualified or trainee

Location, types of vehicle (manual /automatic), specialisations learner/special needs/refresher/advanced/fleet.

what CPD they have done to keep themselves inline with standards

I have no problem with the DSA showing an ADIs grades and location and contact details. Maybe information on Pass Plus or Manual or Auto training would be useful too. I think information on pass rates should not be published per ADi as i dont think this is fair.

GRADE AND LENGTH OF SERVICE AND GENERAL AREA WHERE INSTRUCTOR LIVES.

Length of time qualified.

Current grade and any specilaist knowledge on Driver training

Listings, Tagged for feedback somewhat like ebay 1-5 star and general working area

Band the scores for Lesson Planning (12points), Risk Assessment (15 points) and Teaching & Learning Strategies (24 points). I am sure hte public are interested in how good an instructor is in these area's. Some guidance should be clear about interpreting the scores.

Their grade from each check test

I thought the DSA's role was the testing and licencing authority. If they must list potential instructors they should list ALL licenced instructors in the area (instructors can opt out if they want - Therefore a pupil can check the status of their instructor.) However i do not think it is the DSA role to market instructors. The DSA should provide more 'general information' as they do - on how to choose an instructor and what an ADI licence looks like, speed of learning, how to best organise lessons, the commitment.

ADI grade

How near they are to the pupil and what sort of attitude they have. ie. patient, relaxed, strict

Cpd, standards check grade

Average number of driving faults and if possible hours spent learning. Driving Test averages can be manipulated by unscrupulous instructors

ADI Qualifications and areas covered

I totally disagree with publicising pass rates unless the categories of learner are also publicised. I teach a lot of mature learners and do much remedial work. For example I had a pupil last year who had taken 5 tests, came to me and passed first time. this is no where near the same as a 17year old starting from scratch.

Level(grade) and types of qualification. e.g. Grade 5, DipDI, teaching the disabled □ Length of time as a qualified instructor. □ Pass rates if these can be verified as correct by the ADI in question

That they are fully qualified

Grading

Referrals from past students

Not sure that this will help in any way. Also the requirement for a ADI to provide information would be time consuming and open to abuse.

Test pass rate percentage, cost per hour, area covered,

I believe the DSA needs to make it more public about how many lessons a person is looking at. I know what the DSA recommends as the DSA does tell me via Despatches and email alerts ,etc. But the general public tend not to know and when an ADI tell them, their first thought has being and will be, that ADIs are trying to rip them off. I had had the conversation numerous times of the years. I direct people to call the DSA and or look at the website, but you can see they don't believe it. That would make a big difference. Also, a better understanding of the grading system if it is not changed and 6 is still used as the highest grade. Publishing Grades and other qualifications that ADIs have would be useful for customers to make their decisions. It would also help with the uptake of CPD amongst ADIs. Pass Rates are not always a good indicator. Some ADIs deal with people who are disabled or have learning difficulties so on paper they might have a lower pass rate then other ADIs, but actually they are very good at their job.

Simply that they are registered and competent to give driving instruction.

Grade of an adi which you currently can't check

I think any information available should be offered to pupils and their parents in a none bias fashion.

Previous learners feedback ☐ Success rate - number of learners passing on 1st attempt, 2nd attempt etc ☐ Languages spoken

yes off course however a one off standards check does not give full picture therefore the promotional method who be more appropate

pass rate, as long as caveats are presented as well. A pupil can drive really well on a lesson, but the nerves of the day of the test can result in a poor performance, this isn't really a reflection on the quality of the driving instructors instruction ability, it is more a reflection on the candidates ability to stay cool on a test and put into practise what they have learned. Any industry associations they belong to, as well as current grade.

i dont think the grade should be made available, most people don't know the difference, also some grade 4's can work better at client centered learning than a grade 6 might so it would give a false impression to say the 6 is better

Pass rates / ADI standard/ years experience .

Area covered. Pricing and grade and any further qualifications taken

Experience of other forms of transport Motorcycling, cycling, lorry driver, bus driver, pedestrian, public transport passenger, unicyclist, tandem pilot or stoker, tricyclist, quad cyclist, mobility scooter etc. driving with trailer, riding with trailer.

pass rates if they could be proved to be accurate and make all ADI,s display their ADI badge on test.

Keep current amount of Information. publishing pass rates would be unfair unless you can prove all ADI are teaching the same calibre learner. I specialise with learning difficulties, hence a lower pass rate

Qualifications and specialisms

Clearly their progress through the initial training system if they have not completed it, and their

grades in their most recent tests. It would also be of interest to potential customers to know the success rate of their candidates, though it might be necessary to qualify this with information about the nature of their group of learners so as not to penalize those who specialize in teaching learners who are less likely to succeed for some reason unrelated to the instructor.

How many qualifications they hold - whether basic driving or advanced. Diplomas, PTLLS etc.

All information held

GRADE

Name, email, web, telephone, male, female and any specialist subjects and qualifications

Pass rates, number of complaints against,

Grade and location.

Grade and attitude

I would accept the ADI consensus

A rea, who you work for, experience

Qualifications over and above ADI ie Fleet RoSPA etc ☐ Length of service ☐ Standard

Pass rates are to an extent irrelevant. Instructors teaching more pupils that have extra needs will always have lower rates. Comparing them to the rest gives an unbalanced picture. Especially as the driving test is not universal from one test centre to another. Eg a test centre that uses a dual carriageway on test vs. one that doesn't.

Contact details how long they have been an ADI what services they offer. If the ADI has had complaints against them.

location and grade

I do not think that an ADI's grade should be placed on-line; I think that this should be available on request from the ADI should the trainee request it.

None... Experience and word of mouth is all any person needs to choose an instructor. If this goes any further then people should end up having the right to choose their examiner.

Grades

Pass rates as they are a true indicator of how an ADI performs and are what pupils and parents are most interested in. I have only been asked once in 7 years what grade I am but am regularly asked what is my pass rate

Everything including all their cpd.

Any additional areas of expertise should be made available to parents.

That they are fully qualified. ☐ That they are fit and proper persons. ☐ That they agree to the Code of Conduct

Instructor grade only.

Grade of the instructor and commitment to CPD and additional qualifications BA(Hons) Driver Education Dip DI as example

Highlight the info about ADI's who are committed to CPD. ☐ As DSA knows it too well, better Grades don't always really mean they are better instructors

Names and address only

Any apart from grading, as long as the ADI has achieved a pass.

There needs to be some way to measure what information ADI's claim to provide, most things will be too vague, i.e. every ADI will claim to be a specialist in supporting very nervous learners - how is that defined or measured?

grade and length of service

No that's not fair at all. The pass rate differs from student to student. For example if some starts lessons in their forties they will need more lessons and may fail more than once.

Grading and contact details

All parents and pupils want is cheap driving lessons. Let the ADIs with a good local reputation just to do their job.

none

Any specialised areas to which the ADI is able to deal with...i.e. nervous pupils, dyslexia etc

Publish pass rates of ADI,s

Weather they take (and are proficient with) pupils who are young and white or from varied backgrounds of birth, English spoken and have any physical problems.

Length of service. ☐ Educational Qualifications ☐ ADI's Driving Qualifications (eg ROSPA, IAM Grade etc)

Qualifications. Grades.

any information is fine with me

disclosed trainee or fully qualified, as Instructor will not take on really nervous pupils as it will affect published pass rates

make grade available to the public provided the proposed on-line booking for standards checks is in place so that ADI can improve their grading

Length of time as adi, courses and other qualifications

Personally I feel if you do this then it would convey to me that there are some bad instructors and good out there which should be determined by the standards check. If the pupil does not rate the instructor highly then they will move on and choose another instructor. Like any other business if the public do not approve they choose a different and more reliable product.

Pass rates = number of lessons being given.

Grade, other qualifications such as ORDIT or Fleet, how long qualified and CPD history.

Experience

I think the DSA should stay out of this altogether. ADIs are business professionals not civil servants. There is already sufficient regulation of the industry.

Pass rates

Only that they are fit to teach.

Learners find out their own info reg instructors without having to contact DSA

Number of years on the register and grade.

test results for previous 12 months as a percentage so as not to favour those who are part time with fewer tests

Length of time qualified

Contact details and the number of years the ADI has been teaching.

Realistic training hours forecast. Many parents today still expect pupils to be ready for today's test within 25 hours training. Reissue the pamphlet "Safe Driving for Life" which gave parents realistic expectations into how many hours their child should expect to take before being test ready. The DSA withdrew this information leaflet several years ago, giving the ADI no back up at all on this sensitive issue.

it would be useful for learners and parents to know what qualifications ADIs hold but since the learning takes place in a confined space then people are still going to rely heavily on good reviews from previous pupils.

The Standards Check MUST be fair to the ADI. If it isn't then no information should be given to parents/pupils. However if the SC works, then the SC check can be available, providing there is a positive descriptor for all ADIs shown to be capable

only the ADI's grade but not pass rate as there are so many variables which affect individual pass rate

I don't think pass rates are a fair guide to the quality of the instructor. As nerves of the candidate can affect the test a lot. If an instructor normally presents a decent quality candidate for test I

think that is a better representation of the instructor.

HOW LONG THEY HAVE BEEN ADI

WHAT GRADE THE ADI IS AT

THE OTHER SKILLS THAT THEY MAY HAVE

What other qualifications ADI's hold

Grade ☐ CPD qualifications

I agree that individual ADI's should be able to explain what services they provide. However, if you are thinking of putting in pass rates, I believe this would deter ADI's from accepting pupils who will prove difficult to get through the test due to nerves etc. as they won't want their pass rate to be reduced.

I feel the current information is sufficient, that the instructor has agreed to abide by a code of practice and that they are committed to CPD.

Check test / standards check grading.

How long an instructor has been qualified

None of what you currently hold! What you should be doing is gathering info such as: customer feedback; pricing and its deviation from the mean for the area; crashes post test in the first year or two.

advertise in local papers

Areas they cover and whether they cover any special pupils, disabilities, languages, nervous pupils, older pupils.

Pass rate / Grade ☐ How many years working as an ADI ☐ And trainee or full licence

Pass record for instructor against local average

The only real information the DSA has about an ADI which is accurate is the date of his registration and the current make and age of the car he is using, and his whereabouts of course. The check test provides no insights as to reliability of character/ethics.

I think the public should have the right to see how that instructor they are thinking of employing has done in the past. At the test centre I use it is the same instructors getting fail after fail walk back after walk back.

How many candidates are presented in the last 12 months for test & pass rates.

Gender, experience, age. Pass rates are unfair as some ADI's focus on different age groups. e.g. automatic tuition is generally taken by more mature people and less by 17 to 24 year olds - older people generally take longer to master new skills and may take longer to pass. Generalisation does not work.

Location, official pass rates, and Grade

Their Grade ☐ Date of qualifying as ADI ☐ guidance to the parent or pupil as to how this information can be found to be sent out with provisional licence by the DVLA

Pass rate if pupil passes 1st 2nd of 3rd etc attempt

Pass rate if pupil passes 1st 2nd of 3rd etc attempt

Test centres used ☐ Time on register (no. years experience)

Length of time as an ADI. ☐ Grade. ☐ Sex of ADI.

Grades, experience, ongoing training courses attended, NO personal information.

None they only care about pricing

grade maybe pass rate

pass rates

Grading and experience. I think there are too many variables to include pass rate.

Extra qualifications obtained, years of experience, grading

Grading

their grade

Name, contact, grade, location, length of qualification

Areas covered, average pass rate, ADI rating

Not sure if it should be the grade or the pass rate. ☐ Perhaps customers could give feedback about the individual instructors on line after completing a test.

Publish standard check grade but not pass rates as some ADIs teach disadvantage and socially deprived pupils, these will need more help ie more lessons

All

years as an adi

instructor grading

Generic information on what to look for. No individual information on an ADI via DSA. Best source of info is via recommendation.

Practical test pass rates

Their grade and 1st time pass rate in comparison to local test centre and national average.

Amount of CPD. Extra qualifications attained. NOT pass rates. An excellent instructor can still have mediocre pass rates as they can't control each pupil's performance on the day that matters.

Nothing more than at present. "Grade" seems to be of little interest to potential learners and Pass Rates are misleading in isolation and would lead to ADI's "cherry picking" pupils for test.

length of service. grades too easy to manipulate.

Grades ☐ Qualifications ☐ Test centre used

Grades, how close

Unfair, word of mouth is still the best recommendation

Driving experience, Eg, car, motorbikes, LGV, PSV, advanced driver..

Pass rates, average driver fault on test. ☐ Give people option of choosing an instructor outside of their local area.

Number of years license held and driving experience. ☐ Pass rate. ☐ Access to previous pupils for recommendations.

Pass rates, average driver fault on test. ☐ Give people option of choosing an instructor outside of their local area.

Number of years license held and driving experience. ☐ Pass rate. ☐ Access to previous pupils for recommendations.

Grades only as pass rates are unfair as vary centre to centre and area to area and also with luck on the day. Perhaps a feedback system from previous customers?

pass rates

Easy to fake stats so I think a list of questions for the caller to ask the potential ADI would be more useful.

Grade and driver trainer qualifications

GRADING AND PASS RATES

additional qualifications where obtained

Their grade. Length of service since qualifying. Pass rate averaged over the last 12 months alongside the National Average.

Publish the ADI's grades and let the parents decide

Grade & pass rate

What about a yearly track record of passed learners and their relative ages etc

Pass rate.

Time since qualification and whether they've signed Code Of Conduct. Also, any CPD training they've done

None.. The DSA has (and WILL have) very little meaningful information on instructors.

Full information made available to all learners included with their provisional licence from DVLA. Instructor grades being published on "Find My Nearest"

It wouldn't matter. It would be fair to compare a instructor with a lower pass rate who teaches in a poor area, with one with a higher pass rate in a rich area. ☐ People will only choose a ADI from recommendation or price or what they read on the web.

location, areas covered, specialisms, compliance with code of conduct, CPD,

I think today's parents go by there budget for lessons and recommendations

Name Address Email and phone numbers, every thing else should remain private

Be totally open and transparent

Pass rate

None, you do not publish pass rates for DTC so why publish ADI figures.

Address & contact details.

Previous customers feedback after passing

Issue a certificate(s) to all ADIs with relevant information on. The ADI can then choose who to show it to.

Do not use pass rates as a guide some ADI's take on difficult pupil loads whether it is about language or cultural differences and their pass rates may be well below the so called national

average

The amount of information made about ADIs should be limited to nothing more than a name and registration number. The level of ADI (grade) has no relevance to whether a pupil will learn any better, parents are looking for someone to teach their child to drive I have never been asked for my grade/pass rate etc

Pupils feedback on instructors teaching style, ability and communications skills, patience etc,

None

not sure as to how this info would be obtained

There should be a facility on the website so pupils can put comments about their experience of learning with the instructor (testimonials etc) ☐ I think it would be unfair to publish pass rates and instructor grades.

pass rate and how long adi has been practising

the grade. ☐ the CPD of each instructor ☐ the pass rate

Contact details, compliance with code of conduct, Grade

(1) Pass Rate has to be published

(2) Lesson fees

(3) The average time taken by that individual ADI to get a pupil to test standard

(4) Access to telephone testimonials from previous pupils to confirm, teaching ability and professionalism

(5) DRS Check (formerly CRB) having been carried out and is clear of criminal offences

(6) Requirement to produce the Green Badge to pupil and parents

(7) Requirement to produce a Trainee (or similar) Certificate to pupil and parents

(8) Requirement to produce a DSA leaflet explaining all requirements, and to list these requirements on the DSA web site

(9) Certificated proof of how long the ADI has been practicing his/her craft as an ADI

(10) Requirement to produce (if asked) evidence of CPD achievements

(11) Requirement to display prominently on the upper body an DSA-issued ADI identity badge (with photograph)

Years on the register and whether they have had any sub standard check test results ie 1,2,3

current adi grade ☐ years on the register ☐ pass rate

Most Parents and Learners know that If an ADI has a badge they are qualified and then all they care about ☐ is the price of Lesson being charged. ☐ Only their locality should be disclosed. Most parents go by word of mouth.

none

Is the ADI fully qualified or on trainee licence ☐ Pass rate percentages ☐ Time qualified

Grades and pass rates

I think the current information available to the public is adequate. I do not feel it fair or right to ADI's that the DSA publish grades or words relating to how they performed at a check test. From personal experience (especially in the early years of qualification), I have struggled with with the check test, receiving a grade 4. This I feel is down to nerves on the day. During normal lessons I feel my instruction is of a higher grade as I'm not under pressure to perform. I have had very good feedback from lots of my previous pupils as well. By allowing pupils to know check test information the DSA could be putting a lot of ADI's out of business. Especially those in the early years of qualifying when ADI's struggle to get your business off the ground.

Where there are particular features about the qualifications held by and ADI or facilities that they offer, this information would be useful. Publishing pass rates would be more contentious. If and ADI specialised in your example of supporting very nervous learners they are more likely to have a lower pass rate as "test nerves" can often be a major cause of failure.

Complaints only

Areas, qualifications,

Possibly the ADI's grade but not details of test passes as this would be very unfair as some

ADIs don't put many students in for test.

There should only be information with regard to confirming the instructor is registered and the area/town the person lives, any other information should come from the ADI

Pass rate percentage is less important than displaying how many learners an instructor has successfully taught

Pupil feedback. Send a questionnaire to pupils asking them about current instructor and any others who have let them down in the past.

Grade. ☐ Pass percentage ☐ First time pass percentage

Other skill areas, i.e working in instructing but in other industries such as factories, familiar with HSE policies ☐ Skills in handling nervous or hard of hearing pupils, mature pupils etc

phone number, web address, grade, maybe even no of years they've been an adi

Their grading.

How long they have been an A.D.I and the area in which the A.D.I works

Very difficult to publish much that is fair to everybody as there are a multitude of 'exceptional situations' e.g. pass rate over the previous 12 months is an obvious choice but doesn't account for the ADI who specialises in clients with special needs who find it difficult to learn and therefore pass a test. The example you give of 'highly nervous learners' - nearly every ADI would claim that one!

not sure

Difficult one. Perhaps after a 4point questionnaire same as poor, good, very good, after completing their test. ☐ Reliability. Good on tuition. Relaying information. A fit and proper person. Perhaps

I think the vast majority of new drivers trust recommendations of adi used by friends I'm not sure how you will change this

Pass results for the particular AID be available, not just word of ADI

The amount of tests that have to be terminated by the examiner because the learner is not ready for the test

Pass rates should not be given since they can be manipulated by an ADI very easily. Making pass rates public will also mean that people who really need an able ADI such as poorly coordinated or less able pupils would obviously find it very difficult to be taken on by an instructor who would be forced by the commercial pressures brought about by disclosure of pass rates to refuse to take on such pupils. Some instructors will also take on these pupils and take them for as many lessons as possible before refusing to allow them use of the car for the driving test and thereby protecting their pass rate.

Years of experience & % pass rate.

name, age, how long in the industry

Years of service pass results

All information available

names and addresses and the fact that they are qualified and registered. nothing else is required as most business is generated by referrals

In regards only to any complaints to the DSA or from the test centre in regards to the instructors conduct or the substandard presentation of there pupils

that they are qualified, crb checked...length of service and locality

The grading, also where the instructor specializes, ie. nervous drivers,

in my opinion the current information is satisfactory

Pass rate of the local centres and the Pass rates of local instructors would be good, But the information must be 100% accurate as if there is any inaccurate information It could lead to liegal action

Grade and explanation of grades

The information released by the DSA must be with the consent of the ADI and ADI's must have the right to withdraw from having their personal details displayed at any time they wish. Further

the DSA must not discriminate against any ADI who decides they do not want to sign up for CoP or CPD i.e. the absence of marks against their names on the published information

There grade. and maybe test results.

The ADI grade

pass rates should be available

Pass rates and pricing structures

Pass rates

Show pass rates

Amount of extra qualifications, an opportunity is here for the new assessors to provide recognised CPD courses. ☐ Pass Rates. ☐ Standards check grade.

Amount of extra qualifications, an opportunity is here for the new assessors to provide recognised CPD courses. ☐ Pass Rates. ☐ Standards check grade.

who asks for info? for most its sufficient that we are qualified

ADI grades, encourage to ask friends and colleague's for recommendations, and above all change instructors if you are not happy.

This is a tricky one... if pass rates are issued, they should be over a good, lengthy period - 18 months or so to help smooth out the effect of groups of passes and fails. Even that would leave people who deal with those with disabilities and those serving the foreign drivers (who traditionally require an ADI to work harder due to the communication issues) looking bad in some cases. This is a very, very hard issue to deal with in my opinion

The correct contact details for starters many ADI have wrong details

Qualifications and check test (standards) grade

None other than name address and phone number. They can make their own minds up.

contact details only

With ADIs expressed permission, details about grade, with regard to training whether ORDIT registered, any other qualifications relating to driving skills, CPD activities.

Location, Standards check grade, Specializations, Additional qualifications

Improvement of public information is good. But to use pass rate isn't a good idea. Why because all good instructors only take pupils to test when they are 99.9% sure they can pass the test. The other .1% is the pupils nerves on the day and it's this that causes havoc with most instructors pass rate.

Grading, further training undertaken, first aid trained etc.

CPD achievements

Grades ☐ Other qualifications

you can get a 6 how charges more because they are a 6, it means they are good at check test, the system should be on passes and the examiners report as they see how good the drivers from the schools are.

Grading

% of success rates

Hours committed to CPD

CPD info ☐ New grading system as above, as current one they don't understand

Commitment to CPD. Abiding by the DSA Code of Practice. Additional qualifications held by the DSA.

As previous, make freely available check test gradings and explain what they are and why they are important. Pass rates could be considered however I do not submit students for any form of test as I work for government and would wish for my details to not be made available. Perhaps there should be an opt in option to this.

All qualifications

experience/qualification

Current grade and experience

Time in the Job -- Male or Female --

None, unless the information was able to be changed daily. Again, this will be advantageous to larger schools and will not let potential customers know what instructor they will be getting.

If the registered instructor belongs to a national recognised professional association ie DIA.

The Grade

If there were any bad reports on the ADI.

CRB Checks, ☐ Costs ☐ How long they have been an ADI

I think keeping a record if the adi pass rate would be a good idea

pass rate

Without knowing exactly what DSA proposes to make available, I can't comment accurately, some information could be interpreted adversely by prospective learners and parents - a little knowledge is a dangerous thing - as the saying goes.

I don't think any information should be available because each ADI and their pupils are individuals, learn differently, in different areas. It is unfair to compare an ADI who teaches 50 hours a week to someone that teaches 5 hours.....

Certainly not the grade as apart from this being able to be manipulated by the ADI on the check, it really bears no relevance to the ADI's ability to coach/instruct/teach. Information on what the ADI offers in terms of lessons, courses, prices, hours of operation, testimonials from past pupils etc. is more useful.

None

Pass rates

Not much unless the DSA can keep better records than in the past - the yearly test records we received up until 6 or 7 years ago were often way off.

ADI pass rate

I can't see what more info you can put forward, certainly the amount of test passes a ADI has is not indicative of whether they are good or bad ADI's

The grades to show a qualified ADI against a PDI

Let parents know there is such a thing as Find Your Driving Instructor. I think most parents do not know about this service. Let them see your grade and that you are doing CPD to improve yourself on a regular basis.

Just there location, name , an contact details. If you publish the instructors pass or failure rates this can be detrimental to the instructor ... For instance in 2010 I suffered two heart attacks an was out of work for over a year... There for no tests was taken during that period.

Adi grading and other relevant qualification eg. Fleet/Orit?Ptlls

Number of tests presented during a year and pass rates

sorry that's a tough one !! I'm not up to speed with "Data Protection" law.

Driving experience

past test rates

our grading, location, pass rate, length of time as adi, pass plus registered, any other qualifications

there is nothing better than word of mouth.

This could prove divisive and harm otherwise good instructors with a lower grade while putting others in an elite group, but understand that it could drive up standards. On the whole I would not be against more information being made available to the public. But exactly what I am not sure of.

Name, Phone No, ADI No, Areas covered, Type of vehicle ie Manual/Automatic, services provided ie Intensive/Semi Intensive Courses, Pass Plus etc

Grade and additional qualifications or expertise

Nothing other than that the driving instructor is either an ADI or a PDI and that they have been cleared by the regulatory criminal records checks, etc. Anything other than that cannot be quantified or guaranteed so to give other information would be misleading at best and could lead to claims of misrepresentation.

Anything relevant that would enable them to make an informed choice.

how long the person has been an ADI for.

Experience and whether they hold additional qualifications

As at present,

names area web sites email address

None

name and phone number

How long they've been fully qualified.

ADIs grade & age.

No third party information should be available.

Pass rate

The public need to be made more aware of the grades and what they mean. Pass rates reflect on how well the pupil performs on the day, and not how good the instructor is.

Social media has usurped this proposal, take a look at facebook twitter and driving school websites. This proposal would be a waste of public funds

Pass rates for previous year.

PUBLISH PASS RATES

The fact that they are qualified should be sufficient, otherwise new ADI's might struggle to obtain new business.

Check test/Standards Check information.

Time qualified, specialities (Auto, Disabled, advanced etc)

Name Address And Telephone Number

contact info only as some ADI's teach pupils with learning difficulties etc. therefore pass rates etc. could be misleading

I believe that people are interested in pass rates when looking for an instructor and not grades. Pass rates can change day to day whereas a grade is 'on the day' and then you're stuck with it for at least 2 years

Year's of experience , grade, qualifications.

name, address, contact details, grade, type of training offered.

experience ☐ pass rates

Not DSA job to promote adi people will hire on recommendation

again not sure how this benefits as the majority of my pupils are recommendations from other pupils

I only think customers should know the pass rates of individual instructors if the DSA is willing to publish the pass rates of individual examiners. The grade should be published, as long as the check test is conducted by an appropriate individual.

All learner s need to know is that the ADI is a registered ADI . If you say that 1 is better than the other surely this is discrimination and could put some out of business. Just because your not a*

doesn't mean your no good !

stop meddling

Number of pupils entered for tests annually

pass rates and how long qualified

As much information as possible so leaners can make an informed decision.

How long they have been ADI's. What other qualifications they hold. How much CPD they have done.

Length of time as a ADI

Type of tuition, ie learner, accessible training, auto, manual or special needs qualifications

Name, address, length of time qualified. Certainly not pass rate. Pass rate depends on geographical area, social status and spending power of pupils or parents. Some very good instructors work with pupils with learning difficulties etc who struggle with the test. The ADI should not suffer because of this.

Grade... Pass rate.. school name and telephone number

I have no comet as I have no idea about it.

It will be difficult to inform the public as each individual is different with regards to their desires!

i dont no of any parent or leaner that has gone onto dsa web site to find out my information.most of the parents are looking for recommendations from other pupils. they are looking for a price thats affordable to them, and an instructor that they can trust! to turn up on time teach there child to be safe on the road.

Current information is sufficient, although Pass rates for ADI's should be available to potential customers. This would ensure that potential customers can determine which local ADI is providing the best service.

Check test grade - with ADI agreement ☐ Specialities - eg towing

I would leave it as it is

length of time on register. pass rates and grading

Ethnicity, languages, disabilities taught. Pass rates could be used but the cost of administering this could make it prohibitive. Grades mean nothing to the public.

Explain the need to have qualified, experienced ADIs, and preferably make training with ADIs mandatory. ie do not permit trainee drivers to be accompanied by friends or relatives etc.

As above. Also, some ADIs take on the more difficult learners, those with multiple failures. Some means of recording this would be useful to learners and parents.

I think it is satisfactory ☐ as it is.

Pass rates, experience, what car using

Grading ☐ Advance driving qualification ☐ Specialism (e.g. working with disabled, older drivers)

Age , length of service , percent of male ,female pupils having taken tests

Potential consumers need to know more about the ADI. The check test does not weed out poor instructors. Learners should be guided towards recommendations for individual instructors. The DSA needs to gain more information from pupils regarding the quality of instruction and ADIs who put below standard students in for test must be investigated more thoroughly than a standard check test.

I certainly feel that, if an ADI can prove that they have, for example, experience in other languages, sign language, teaching disabled drivers or have some qualification over and above the standard ADI qualification, it is reasonable to publish this. However, I would certainly be against publishing test pass rates as this will be detrimental to the customer in the long-term as ADIs will refuse to take people to test if they feel there is any chance they will not pass.

I am fully in agreement of informing of current standards check grades, also what type of lesson and pupils are taught. I disagree about displaying pass rates as they can vary from centre to centre.

Years served. other qualifications. Number of test candidates presented for test.

A star rated system based on standards check performance would seem very reasonable as is adopted in some other industries. The differences between the lowest and highest would need establishing and made clearly available.

Grade,training

Their qualifications, for example, related qualifications but not just driving ones. Perhaps their pass rates. I am less keen on grades being publicised, even though I am a grade 5. This is because something can go wrong on the day of the check test and your work is judged on one hours observation.

How long they have been on register, Grade

I feel to declare one,s grades to the public would create a field whereby people would only want a grade 6 instructor,and their are plenty of good grade 4 instructors out there.

Grading

Length of time as an instructor. Test centres used.

Pass rate as long as parents are made aware that pupils are nervous as the test is a big deal. What car we teach in, our CRB results, how long we've been qualified, feedback from previous pupils

Overall pass rate, patience, friendliness, reliability, reputation, learning environment, car used etc

Where an instructor covers, the car they drive, age, sex.

When you have cleaned up the bad instructors from the register ☐grade☐qualifications

Grade, time on the register, extra relevant qualifications (ORDIT/FLEET/CARDINGTON TEST etc.

Pass rates

Pass rates

Contact details only

No you are talking about the grading system giving this information based on one check test this could be the opinion of one examiner

If we have a graded system that can be passed to future clients rather than satisfactory.

As above, does the Instructor have any awards, what has he or she done in a previous job. Can there Instructor drive bikes, drive lorries, tanks. A profile would go a miss.

Learners and parents need access to comprehensive and impartial information to help them choose an ADI. DSA/the Registrar is best-placed to provide such information and as a government agency will be seen as a credible and reliable source.

General contact details and grade should suffice. If the instructor as a website, then maybe a link to that website - with the instructors consent of course.

If you publish pass rates you will split the industry into those who care about such things (and make pupils do ludicrous hours) and those who attempt to assess their pupils for the test standard, recognising that they will probably double their experience in the first month or two if not sooner. Also how would that be fair on poorer areas?

Grading and length of service and also with CPD it should be logged with the DSA the courses that the ADI has undertaken and be made readily available to view online. Pass rates I believe can be manipulated currently, especially with ADI's removing their badge from the windscreen. Someone teaching 17 boys will have a greater pass rate than a female teaching middle aged nervous women.

Possibly testimonials from past pupils. I do not agree with using pass rates as many of my pupils are nervous and make silly slip ups that I have no control over. Possibly a picture/photo areas covered and car used

nil. Customers should make their own enquiries with ADIs.

Grades and Percentage pass rates and years on the register.

everything

Cpd

Apart from confirmation that an individual is an Authorised instructor I would question should any other information be made available.

Name of instructor and driving school, adi grade, type of transmission (man/auto), sex (male/female).

Most work is through recommendations how many times have I been asked about my grade twice in 7 years

Their check test grade

Grading Standard and Pupil Test Pass Rate

Pass rates

Grading if the check test is reviewed as it doesn't reflect true teaching

Other qualifications, eg coaching, specialisms, advanced driving, etc.

More a case of NOT what to include. I would not include pass-rates as they can so easily be manipulated by ADIs (ie by removing their badge from their car on test). Also, some instructors will be very selective what pupils they teach. If a pupil turns out to be quite challenging and the ADI thinks they may not pass 1st time, they could stop teaching them to help 'protect' their pass rate. This happens already but would get worse if pass rates are published. Also, it is well known that pass rates can be lower in more deprived areas.

no of years experience

I personally think that personal review pages are a good idea. I have set up my own which I link from my Facebook/ Twitter accounts. Just like any other service eg bathroom/kitchen fitters etc , people like to go to a section where they can read reviews of happy and satisfied customers. When my pupils pass their test I ask them if they wouldn't mind leaving me a short review.

Grading and recent pass rates.

1- (for ADIs), (ADI name....., Fully qualified Approved Driving Instructor registered with the government Driving Standards Agency. "....Contact details of the ADI... ie.. phone number and

email.) ☐2- (for PDIs), (PDI name....., Potential Driving Instructor, still in training with ...organization name....)

Their Grade, their address and contact details.

A general description of the meaning of each grade only. Personnel information is a commercial issue and should be left up to the ADI to choose if they want the public to know their grade.

None

Customer satisfaction and pass rate

I feel this would make the standards check something it shouldn't be. One snap shot in time is not sufficient to grade somebody. Especially such a public grading that could have a serious impact on an instructor's business. The DSA are a Government body and in a privileged position when it comes to appearing at the top of search engines. Therefore any review by the DSA would be featured very highly. In our view a DSA examiner is not placed to adjudge whether you offer good value for money driving tuition. One poor check test and you could be seriously damaged. I think most DSA SE's would agree that some of their best local instructors are not necessarily Grade 6's. Perhaps an ADI's grade should be calculated based on the quality of their candidates over a 12 month period

years in the business; details of training undertaken; the percentage of business that is recommended; number of pupils taught at any time; not pass rates unless they are banded as some ADIs might not want to take more difficult pupils if it affected their pass rate

Grade and performance

Number of years qualified, number of pupils presented to test last year, pass rate last year, check test/standards check grade

access fair dsa site ☐ of local instructors in the area ☐ just names and address only

Our grade and years of experience .

Would be useful for people to know how long an ADI has been qualified and which test centres they use.

I do not think it is of use to publish pass rates. I am a female instructor who teaches female,

nervous (& sometimes dyslexic) pupils at both Kettering & Melton test centres. I fail to see how you can compare my statistics with an adi who only teaches 17 yr old Melton residents in Melton Mowbray!

None.They soon know whether their instructor is any good or not.

Grading, experience

the grade of the adi

Specialisms and Grading

Enough information is out there, more access able would benefit

grading and cpd records

Other than the usual name and address and phone number, nothing except for any specialties, eg, disabled, automatic. Grades are personal and should remain so.

List all licences adis within a set radius.

Current grading ☐ NOT pass rates (unfair to ADIs teaching those with additional support needs)

Grade. Length of time as ADI. Other qualifications or relevant experience.

local adis list might be helpful in finding one

give genral info. in my experience giving grades can cauce friction between other instructors locally. most of the public dont understand them or what they mean

Qualified. Not qualified.

Location, Approved Driving Instructor, dont think you should make available grading, best form of advertising is word of mouth.

Name, mobile Number, e mail address, facebook, twitter, website. Not home address or pass rates (constantly changing and not understood by many people, greatly dependent upon economics of the area in which an ADI operates.) Possibly grading, but again dependent on the

wording.

Any relevant training/education courses that have been attended with dates & providers.

Further driving qualifications, advanced, such as RoSPA etc.

Any areas of specialism such as disability awareness or competency with dealing with a range of learning disabilities.

Also membership of professional organisations.

Maybe the current grade, but unsure on pass rates as these don't always reflect how good a job the ADI does.

Additional information which may be of use when learners and their parents are choosing an ADI might include:

- Further training undertaken by the instructor (over and above the required VQ). The South Yorkshire Safer Roads Partnership offers further CPD for ADIs as part of the Learn Safe Drive Safe programme which uses coaching techniques to deliver a series of behaviour change modules. ADIs have provided feedback that this has positively changed the way that they deliver driver training;
 - Membership of road safety bodies or activity undertaken with road safety teams;
 - Specialisms in relation to help offered for people with learning difficulties, for example autism, deafness, physical disability.
-

Official pass rate of individual ADI with the pass rate of the test centre ,s used.

Yes the higher grade of an Instructor sells well, but still don't mean there a better instructor. I would like to see Independent instructors advertised more as independent rather than big school name's i am not really sure. It's down to the public

that they are qualified, and length of time they have been qualified

Contact details, adi number

DSA should make every piece of information about the instructor available. When ever I buy a new car I want to know everything from its NCAP rating to the full consumption. They are paying and as a consumer have a right to know

how long the ADI has been on the register and pass rate

serious complints only

Nothing

Voluntary publication of Standards Check Grades. I feel that publication of pass rates is unfair to those ADIs who may specialise in extremely nervous and/or disables candidates.

Contact details, areas covered and how long qualified.

Experience, pass rate

Basic information and grading, pass rates are an extremely volatile subject as any candidate at test standard can suffer from nerves on the day, this would not be accurately read by any potential customer/parent looking for an instructor, and dare i say it, opinion based marks on test

Pass Rate

Previous experience and background.

Pass rates

Only make available details about complaints

Grade, years of experience,

Grade,how long they are an Adi

Why change what is working .

Pass rate

Length of time as an ADI, testimonials from previous pupils

Pass rates□Grading

Pass rate (with comparisons to the average).□Grade.□Post code coverage.

Our standard, business quality, independent or part of an organisation, length of service, pass rates or if above the national pass rate. (could be coloured coded e.g. Green for acceptable and Red for 10% below).

Grade and pass rate

All qualifications.

Pass rates ☐ Grading ☐ Experience

None

Pass rates

Simply the grading

Are they qualified.

That this instructor is fully competent and meets dsa requirements.

how many years as ADI ☐ test passes to date ☐ grade of instructor + member of any advanced driving tests (IAM, ROSPA)

as much as legally possible

Grade only

the grade of the ADI ☐ Any other relevant qualifications ☐ what CPD has been undertaken etc.

Time on register perhaps something like (more than x years/months)

Definitely not pass rates. Most honest ADIs I know already feel passing the test can be somewhat a lottery. I can have numerous passes followed by a series of failures, followed by more passes, you simply never know and much would depend on when sample was taken for publication

As above, pointing out that 'Below Average' is still competent but that they could expect to pay less for the tuition.

Age, gender, location. Type of training offered with vehicle types available. Location and time served as well as the ability to provide intense courses. Nothing more.

Given that most people simply employ the cheapest ADI, I doubt any information will be checked by the consumers. I have only be asked about my grade on one occasion over my 8 years as an ADI. Most customers are more interested in my patience and ability to help them achieve their goals.□.

Do not put pass rates but do use Test center feedback on ADI tests. as examiners understand there ADI's who give good or bad tuition

More freindly website rather than the bland stuff you have at the moment, also make it easier for adi's to update their details, sothey are able to add other qualifications todo with driving & customer care etc

Instructors Grade and an explanation on their specific skill sets IE if they teach disabled pupils

No information should be made available, parents are free to ask each ADI any questions they wish. Information like pass rates and grade can be very ambiguous. I work part time and don't present that many pupils for test over the course of a year, therefore a few fails in a row can really knock my pass rate down and isn't a true picture of my ability as an instructor. Furthermore some people just don't fair well in a test situation and never really perform to their best on their check test which is why I don't believe that the grading system tells the whole story. I have never been asked for my pass rate or grade by any customers, I don't think the public even know that instructors are graded. All the public need to know is that we are fully qualified and crimal record checked. Any other information can be asked direct or found out word of mouth. In my experience this is very much a word of mouth industry and if you are no good at your job word will quickly spread.

Pass Rate□Communication skills as assessed in Check Test

Just contact details.□Grades etc shouldn't be disclosed

Time as an ADI.

Good pass rates by ADIs

Grade

MCI feels that there is merit in making available the kind of information mentioned in the

consultation. However, exactly what should be made available should be subject to a further specific consultation among the ADIs themselves. However, it would be useful and fair to include the grade achieved apart from all the usual contact info. Perhaps there would also be an opportunity to allow ADI's to list their specialities ie nervous or disabled drivers, length of service as an instructor etc. Again the same for motorcycles

Certainly NOT pass rates. eg Part time retired forces ADi takes on a client ,finds them difficult , drops them. Finds a good one keeps them has an easy time and a high pass rate.

eg2 Adi with compasion works generally with people with learning difficulties or physical challenges has less tests per year and has 1st time fails on a regular basis. Their pass rate will be low. Maybe some sort of on line feedback form for clients would produce a picture of how a trainer performs!

DEFINITELY not pass rates. My rate is quite low as I teach in a deprived inner city area with high levels of language problems, low educational standards, poor examples from those around and them and often undiagnosed learning difficulties or lack of self believe. These pupils will always struggle to pass 1st time and often take more than 6 attempts, not because they are not good drivers but because they are not used to be tested and so go to pieces. If test rates were published these pupils would find it difficult to find an ADI to take them to test even though most would willingly teach them as I have heard them referred to as "cash cows" ie they need lots of lessons. I have heard of ADIs teaching these pupils for 50-100 lessons then dropping them when they approach test standard.

Other qualifications the ADI may have.

I think this could be a very grey area. Someone who gets a lot of passes doesn't make them a great instructor. The pupil might have a great drive on there test and get no minors or they might have a meltdown, as its a test and make a lot of mistakes. It doesn't mean the instructors the best or the worst. The only way the DSA can inform parents and pupils on ADI's is on check tests and the driving test. I don't think this can give correct and clear information. What about reliability, cost, quality of each subject, professionalism, and all the other things the DSA does not see????

Pass rates

Absolutely none, aside from confirming that the ADI is on the register. Customers choose their driving instructor by asking friends and family and this works perfectly well. There is no justification for creating an army of clerks at the DSA just to maintain a complicated database. The DSA has given no evidence that there is a demand for this and it would be an expensive and bureaucratic waste, paid for by instructors and their customers. In particular, grades represent a snapshot on a given day of an instructor and the DSA should not seek to restrict (or

enhance) an ADI's livelihood by relying on this very flimsy and unreliable evidence of their abilities.

The CPD training an individual ADI is doing to help further his/her education in driver training thus passing it on to learners and/or enhanced training to qualified drivers drivers

This is very problematic. Publishing of grades could discriminate against lower graded ADI's and tend to put them out of business. Publishing of pass rates could also discourage ADI's from retaining 'slow' pupils, or those who really need more help.

Additional (recognised) qualifications.

None

DSA should enable the public access to the register to locate the nearest trainer on the register and the quality/grading and level of expertise of that trainer

I don't think anything should be made available to potential customers, if they want to know why not put it on their ADI badge and they can check for themselves, if we have a pass or fail system it will not matter anyway.

The term 'general information' could cover numerous things. I do not consider publishing pass rates as being fair and open due to the way in which these can be too easily manipulated by ADIs, e.g. by dropping 'difficult' candidates prior to test so as not to harm their pass rates. Consider whether the ADI has undertaken any CPD or is a member of any professional body.

there average minor fault rates

Grades and test pass results are ambiguous. I would like to see an ADI's qualification and whether he is doing CPD. I might have lots of qualification but struggle in a check test situation. That doesn't make me a bad instructor if I only have a grade 4.

allow proof of passing check test - don't agree with saying what lvl of pass.

Name

address ☐ grade

This should not include pass rates as they are deeply flawed, open to abuse, and have been held to be unreliable by the Advertising Standards Authority in a case we brought to their

attention (we can supply the details on request). Public disclosure should be up to the individual instructor as, in our opinion, this is a confidentiality issue. If the DSA was to make all information available, this would have to include fines imposed under the new system as well as higher qualifications. We don't think that's a problem in principle, but we do think there should be a system put in place to ask ADI's specifically what information they wish to have published.

you could add whether the adi is part of an advanced driving group or passplus scheme or if they have any qualifications they feel would be advantages to learners

Pass Rates. Length of qualification

locality, pricing structure, Pass rate achieved on average.

Address pass rates

Area they work. Name. Type of instruction- manual/ automatic/ special needs

Pupil satisfaction reviews.

The last five test results. The paper of which when they passed. And a picture of their green badge.

Location / Time served / Qualifications (rospa fleet)

how long the adi has been trading, not pass rates as this does not always reflect a good instructor. i.e an instructor that takes on deaf pupils and pupils with learning difficulties generally does not have a excellent pass rate as an a instructor that only teaches people that have previous driving experience.

Whether an instructor is Full or Part qualified. Details of check test grading should not be made public.

relavent qualifications□fleet ,diplomas, advaced tests

Instructors should be able to choose what information is released

Location, qualifications, grade, ADI picture, current vehicle information, short statement from ADI, reviews facility.

None Any information could be misinterpreted by the public, Does it matter who passes 1st time 2nd time and so on, surely safety is paramount!

Name address years in the role but not necessarily pass rates as these are easily manipulated eg remove adi badge with pupils you believe will fail - you see it happen at test centres every day

Grade ☐ Years grade held

Their grades, pass rates, and years of experience. Also, allow learners to rate the instructors (like Tripadvisor do hotels)

PUBLISH ONLY GRADE 6 INSTRUCTORS NAMES !! If the lower grades want their name published THEN they UP their instructional ability !! SIMPLE !

time as a ADI

Years in job ☐ Reputation

As with other professionals some information about all qualifications, training and achievement, this might encourage all ADI's to fully participate in many aspects of additional professional training.

None. The DSA has very limited knowledge of an ADI's comprehensive service & overall professionalism. To judge an ADI upon a 5 yearly 1 hour 'standards test' is an unfairly narrow criterion upon which to justify attempting to steer the public. Local reputation ensures the public generally locates value for money.

Include general information such as name , address, test centre used, including specialities, ie mobility, fleet training pass plus etc, but leaving out pass rates as this is very regional and very inaccurate. Higher gradings can be included but not lower grades as this can be unnecessarily derogatory. A big question I have is could this even lead to lawsuits if a lower graded instructor loses business because of it, he (or she) could argue it was based on one standards check done on an off day and not enough grounds to publish?

None

pass rates, grade and time served. the public seem to be only motivated by lesson charges, they seem very unaware of the quality of the service. an ADI that works hard to achieve a

high standard should be able to stand out from the rest and be compensated accordingly.

None. The DSA do not give out information regarding examiners, so why instructors ??

That the ADI is registered with DSA.

Gender, Age, Years of experience, Part time or Full time, Number of passes,

Most information would be good to be available. Grades + length of time qualified

Name, address, telephone number. I think if you add grading it can sometimes put the instructor under a lot of pressure to keep his standard up and the pass rate can change.

Grade, how long they have been a adi

Additional qualifications

Providing information about how to choose an instructor to learner s and parents when provisional licence is issued

Are they approved by DSA?

ADI's do not need a descriptor by DSA, the public are the ones who can give this information by word of mouth.

DSA can disclose ADIs qualification i.e. grade,advanced test,academic achievement,other language or what each individual want DSA to disclose. ☐ Pass rate,NO NO NO because it depend on ADI,pupils & examiners.

not sure as the pass rate is not a true reflation to any ADI's quality, may be keeping the as it now, or letting the Grade may be an idea.

Instructor sits in on test /Age of Car

There experience and pass rate.

Name and address phone number

Grade□Years on the Register□Area of operation

Years of service would be good and their grading also their pass rate scaled and possible comments from passed pupils.

I don't think that there is any other information that the DSA can give out, as most instructors get most work through referrals than advertising. If parents/pupils are looking around they are just looking to do it as cheap as possible so lowering standards.

As an independent, I wouldn't survive if my reputation was good. How do quantify this on paper?

Releasing the instructors grade would be fair. I don't believe official pass rates would be helpful to the driver training industry, it would destroy a driving instructors career before they begin, this would reduce the number of instructors and increase lesson rates which will put driving out of the financial reach of more people which will have a knock on affect and reduce the number of tests carried out. The DSA would lose money because of this.

all pass rate and grade information is private. there is no requirement to display adi badge when presenting a pupil for test so all pass rates can be adjusted. only display name , contact details and services offered.

Grades and pass rates

Grading, pass rate

grade,□experience.□pass rates.

Name, contact number, years since qualification, number of successful check tests/standards checks passed (but no grades), car used, type of tuition offered and membership of any body such as ADINJC or MSA

Name address and telephone no the fact that you have them on your list should be good enough

Instructor working area and telephone numbers.□NOT grades, this is misleading. Brilliant instructors may be a low grade, high grades do not mean good instructors.

If the ADI is signed up to COP and CPD, as now. No change to this is needed.

Instructor grade - Driving/Educational qualifications

Location NOT grade as can be misleading

Years qualified, ☐ Grade, ☐ If any action has been taken against the instructor within a set time period.

Publish all you want..it makes no difference. As I highly qualified adi I cannot compete against bigger schools charging very low lesson prices.

Basic information only, there is a level of confidentiality. For example, do you know when you get on a bus if the driver has been previously banned etc. More over does giving a lot of details help the potential customer.

Pass rates and instructor grades and support the proposal for ADI's to charge more for higher grade instruction. Tatooists charge £50+ per hour

Qualified or not

Name and contact details only

In my opinion learners & parents will have a general idea of who will be teaching them/their kids. Word-of-mouth or just browsing the internet usually does the trick. To have too much info e.g. ADI grade/pass rates etc isn't always the answer. Let's say an ADI was a grade 6, they may charge more, or may be a male when the learner wanted a female, or not live in the immediate local area to the learner etc. (Reliability.) I like the idea/honour of being chosen after having a chat on the phone, or as mentioned before, by word-of-mouth, or by them finding my website. I know then that it's all my own hard work! (I'm a grade 5 ADI. Should've been a 6 so my assessor said, but I helped with the wheel during my check test to avoid a huge drain hole/save my car & was marked down for it! Not bitter at all!! Ha!)

The instructors Grade should be available to all and clearly printed on the ADI License on both sides so the grade can not be manipulated by the instructor

Grades could be made availble, but as i say most clients don't seem to care. ☐ Pass rates I think not. eg, last I had a number of problem clients, two really nervous people and a handful of a handful of "foreigners". Awful pass rate, they would still have failed with an unqualified unknowing examiner. This year a different batch of pupils, english speakers, able, confident and

motivated and maybe a bit lucky as well. Pass rates over 5 years maybe. The amount of time spent as an ADI might be useful as well

I would not like to see gradings or pass rates published. The fact that ADI's have been approved by the DSA should be enough.

You could show their CPD but not a lot else matters - pass rate are misleading and any figures or stats can be manipulated to mean anything

I don't think publishing an ADI's pass rate is fair, but publishing their experience & any further qualifications would assist learners more.

Grading. Types of tuition they are able to deliver.

Not sure are pass rates a fair judgement Does it not depend a lot on demographics

Leave this to ADI's they advertise themselves. We don't need inaccurate information in the public domain.

Pass rates, I feel all ADI should be judged on there personal pass rate, if an ADI falls below a set % then that's when a standard check should take place, so we all keep a high standard of teaching, I always work hard so my students learn to the highest standard and that reflects on there driving test result.

Pass rate %

Grade and number of candidates presented for test as learner and / or PDI categories

Show any relevant statistics, but either show ALL ADI's details or NONE

Not pass % as this does not represent a fair level of assessment due to the type of pupils that trainers take out i.e special needs etc.

It is difficult to have information which crosses all the training disciplines. □ Test results for those teaching Novices can be skewed by specialisms, e.g. clients with learning difficulties, where test failures are going to be more common. In my case, presenting B+E candidates (where I have a 96% first time pass rate, but no-one records it....) is skewing the figures in the opposite direction. Other professions do not seem to be so obsessed with providing such information. ADI's who are not competent don't tend to last too long anyway.

parents don't tend to look at the list unless there is a problem with the instructor. So relevant instructors to pupils requirements in the area would need to be given when at school at ages 16 and 17

Age experience and grade and pupil feedback

instructors grade and further qualifications attained.

Pass rate ,customer satisfaction

This needs a separate questionnaire.

pass rate and the fee they charges for the tuition and ADI's additional qualifications

I feel only the services we provide. The DSA should make sure we are fit and proper.

Grade, years qualified, additional qualifications, specialities

None (Recommendations)

i think grade and pass rate should be made available

I think it is between the DSA and myself about my mark. □ However if you go ahead with this I will fight tooth and nail to have examiners marks or comments to be published so that the consumer knows the quality of the examiner conducting the test.

Make it that they have to be told if they are getting a p.d.i.

The majority only look at price

In my opinion it is not the role of the DSA to make information available to parents and learners . This is already archived by market forces,if an ADI is any good then they will get lots of referrals. □ The DSA could suggest relevant questions that a parent or learner can ask .

Name, locality, driving school, auto/manual car, cotact numbers, email address, website link.

Time on the register, current grade, previous grades, additional qualifications.

No personal info ie address, happy to have grade published but not pass rates.

Dsa can only make available official details ... who's on the register and no criminal records etc against their name.

I do not believe that making information available will help as nerves play a massive role in test outcomes & I san ADI finds a lot of nervous students on the books they may choose not to work with those student, thus reducing the choice of available ADI's

how much CPD the instructor has completed □ statistics regarding pass rates and ADI grades are generally worthless

the instructors telephone number.

None of the information that you give can be totally reliable. Grade should be available, but not the only consideration. Pass rates are hard to give based on the fact hat they change with every test result. Years of service does not guarantee a great ADI, but all the above would help the customer make a more informed decision. I think the DSA, should be guiding parents better, for example: on your web site you advise the public that it takes approx 40-60 hours tuition to get to test standard, but this information is not available anywhere except the web site. It should be sent in an information pack with a driving licence.

Grade and many years as an ADI

Experience. And grade

Years established

Driving & Tuition/Coaching/Training Qualifications. □ Length of Service.

None, it should be up to the individual instructor what information is available to the public. Dsa should make that option available for instructor by means of a web site or web page where the instructor has total control of what information is available.

specialisms, ie, patience, language, female onle, automatic, disability, etc.

If an instructor passes all the in place criteria it will not matter.

Publishing grades would not be fair □ Length of time as an ADI □ Special skills.. Fleet, disability

training, adapted car, automatic, second language

Grade

All info should be available about all instructors on register not just ones who shan't it

This is very difficult to judge as the pass rate is the thing that most pupils and parents ask about but is fraught with complexity. Grading of ADIs is the only relevant info.

Experience & date of qualification

Qualified ☐ Gender ☐ No convictions

1. No of years as an ADI ☐ 2. ADI Grade. ☐ 3. Pass rates

I have little faith in the check or standards check, so this makes it difficult. Pass rates, providing the DSA make a big effort that test results are correctly recorded against ADI numbers possibly. The DSA should publish commitment to voluntary code of conduct and CDP as it already does.

Contact details only

I don't believe that this will be of any help to learners and/or parents as little if no relevance is paid, in my experience, to the detail that is currently available.

Grading structure and what it means for learners. ☐ More advertising and publicity to differentiate between sub-standard instructors and the cream of ADI's.

Areas the instructor works, their grade, how long they have been on the register, any complaints they have against them. The latter could work as a deterrent to instructors as this could affect their business

none

Qualifying grades,

None I think the public should be able to choose.

If publishing pass rates suggest you show manual and automatic pass rates separately.

Perhaps an overview of examiner feedback from the last years standard of pupils you have brought to test. It would be unfair to give out pass rates as there are too many variables. Our client base comes from customer referrals. No other considerations seem to hold sway or matter, so I feel this avenue would be a waste of time and resources. Although this is covered by the young driver debate - a minimum learning period(amount of hrs) would benefit my initial idea about examiner feedback.

Grade ☐ years approved ☐ compliance to COP/CPD

We are teaching a skill and to do this we have been tested and passed to the required standard set by the D.S. A. How much information do other teachers have to provide for their potential students ?

Continue to highlight the grading system when choosing an instructor. The big issue with instructors however is that CPD is continually developing and lesson fees are that of 20 years ago. Such chasm between ADI standards and remuneration appears to grow.

how good there past marks are

the pass rate over the year and check test grade should be made available

I'm not convinced it would be fair to publish an ADIs grade, but location, and relevant qualifications gained through CPD would be ok to be published.

Their grading. ☐ Their continuous professional development, so parents and pupils can see if the ADI has passed the test and then never bothered to improve their skills or if they are committed to providing increasingly good quality instruction. ☐ Amount of time they have been an ADI ☐ A personal statement from the ADI (not more than 100 words) about their skills and abilities to deliver training.

ADI qualifications, standard check results, CPC etc.

It will make no difference what you do as it appears to have already been decided

Pass rates are not a good factor.

Qualifications also are not the greatest rating. ☐ Word of mouth - referral is the greatest factor.

Grade of ADI ☐ % pass rate

I know some excellent ADI's that cannot perform well at check (or standards) tests, so don't get graded as they deserve. The public have never cared if an ADI is Grade 6 or whatever. It's all about reputation.

Length of service - pass rate but compulsory to display badge on test - ADI grade

Name and grade

I think their grade, and any CPD that they may have undertaken would be useful for learners to make an informed choice of instructors. Pass rates aren't as useful as this could potentially encourages ADIs to pass on learners that aren't able to pass the practical test due to nerves.

What services they offer I.e manual/auto, fleet, motorway, pass plus, specialist in special needs pupils, if they have car adapted for disabled pupils.etc

LOCATION

The number of learners on the ADI's books and the pass rate.

Grading. Length of time on register

CPD

I think it is important that consumers are made aware of instructor grades and instructor commitment to Continuous Professional Development and the new ADI Code of Practice. Pass Rates can be misleading and don't necessarily reflect the effectiveness and quality of teaching. I therefore am not in favour of publishing pass rates.

Pass rates

1) Pass rate ☐ 2) Particular skills- additional languages

Information as available now no addition necessary

Pass rate by percentage only on turn over of students presented for test.

Name, number, recommendations and pass rates, where they usually drive as test routes or all

over inclusive of town driving, fast dual carriage ways and country roads.

time served grade contact for passed pupils.

Years of experience, professional qualifications eg PTTLS, USP,

pass rate

Name, Reliability, Pass Rates

Time period being a qualified ADI. Any additional qualifications (CPD) gained.

ADI Grades and Test Results

Who is an ADI and nothing else,Data Protection Act

What CPD has been done ☐ pass rates

Leave it as it is now.

Years of experience ☐ Pass rate - proven ☐ CPD compliance/quantity

Grades & any specialalities

None!

Name ☐ Address ☐ Phone

Number of years experience. ☐ % ratio of driving test passes in comparison to the UK national average

PASS RATE ☐ TRAINING FOR SAFE DRIVING - NOT JUST TEST PASS ☐ VALUE FOR MONEY

ADI Grade and Pass rates

Time they have been an ADI plus previous job qualification

How many learners and parents access the information available now? I suspect very few. Good ADI's thrive on referrals and recommendations I suspect the not so good ones do not. I believe it is the ADI's responsibility to promote their business, not the DSA's.

The pass qualification should be sufficient. I am against the publication of pass/fail results on the grounds that an instructor taking tests to Ballater DTC 76.2% pass rate is better than an instructor going to Wanstead DTC pass rate 36.7%. Pass/Fail has no resemblance on the quality of an instructor. Now a "testimonial" from pupils would have a greater impact, because it is a reflection on the instructor's quality under actual conditions.

We support the principle of providing those buying driver training services more information so that they can make an informed choice. However whilst giving members of the public more information is a good idea, in practice this is a difficult area. Ideally showing how successful an ADI was would be useful but, the definition of success is highly complex. Pass rates are a very crude measure and may lead to instructors restricting their tuition to those groups that pass the test more easily. Instructors should be encouraged to teach learners to drive safely – not just to pass the test. Publishing pass rates would have the opposite effect. Therefore we are against giving out crude measures as it may lead to some groups being discriminated against.

We would therefore suggest that the published information is limited to:

- Qualifications
 - Specialities where these can be proven e.g. qualification
-

CPD information might be useful. I feel the DSA should also spot check this if being open to the public. Publishing grades might be helpful but given that the top graded instructors are the minority in number terms, they might get too much work to cope with! Publishing pass rates is contentious-some local instructors advertise near 100% pass rates. Are these claims ever checked by the DSA? How would these be calculated? First time pass or overall pass rate?

Area covered. Any specialist offerings. No information regarding test results as this is a reflection on candidate. 'You can take a horse to water but you can't make it drink!'

Information made available should be that the instructor is an ADI and not the specific grade, and that the instructor has attended regular check tests and has passed this test. All ADI's should be treated equally whatever their grade.

the experience of the ADI and area of the ADI, dont feel the pass rate will help as this will cause some pupil who are hard to teach problem with getting a ADI

People want to feel they can pass with their instructor. Grades are immaterial so first test pass

rates are what students and parents are interested to make sure they get value for money

Include: ☐ Name and location or area worked in. ☐ No. years experience. ☐ Additional skills, e.g Fleet badge holders, motorcycle, truck, bus, etc. ☐ Do not include: ☐ Home address. They do not need to know where I live. ☐ Pass rates. The pupil passes or fails, not the instructor. Pupils with good skillsets can fail due to nerves, those who are adequate may pass first time. Having had the last 6 pupils pass, or fail is no guide to the performance of the next one.

ask each adi for their individual thoughts ,have a minimum set hourly rate of lesson price

Well I have a much better test record than some of my friends who are grade six. I am a grade five so who is better for the parents?

Only one and its simple, publish their Pass Rate, it is the only true pointer of an instructors ability in my opinion. anything else is a filler or attempt to 'find' something which isn't there i.e teaching nervous pupils!!! We all do.

grading

Any qualifications or diploma an instructor may have, use those. Do not use pass rates as that would mean slow or difficult pupils would get passed on from instructor to instructor.

An ADI qualification details & contact details. There should be no need to give any other information.

I believe learner drivers look for recommendations more than individuals information most Adi,s who us websites etc will have all the information that a potential learner needs therefore I think the DSA,s find your nearest instructor service only needs to display contact details as supplied by the Adi.

How long an ADI

Monthly updates on-line, info posted in libraries, ☐ test centres inc Theory test centres

For any information to be fair and useful it needs to be placed in context. A one hour standards check does not necessarily accurately represent the real world abilities of the instructor - they may be having an 'off' day and represent themselves poorly. Therefore publication of grade may be misleading. What about information regarding overall and first time pass rates? How would these be made relevant? Instructors may be working with a particular social/economic group of the population, which may influence the percentage pass rate for that group. I think this is a very

difficult area to tackle and could lead to claims of misrepresentation.

length of time on the register

pass rate

I think an explanation of the grading of ADI's is explained better

percentage figures on Pass & Fail. Time in the industry

Name and grade only.

not pass rates! it sets the wrong goals! ☐ a full CV of the instructors life experience in driving and training would be useful and endorsements. checktest grades for a period of time to show development and improvement.

Prospective pupils/parents should be encouraged to ask individual ADI's for evidence of their experience/results as these will differ depending on the geographical location of the ADI.

Date of Qualification. ☐ Grade

None. Each ADI should be given a certificate when they have their "Standard Check". DSA should make learners and parents aware of the grading structure, that every ADI is regularly assessed, and that should be able to produce the current certificate (and former ones) on request. ADI's should be proud to advertise their personal grading as it is part of what they are. DSA is the architect and assessor only of the grading structure. The grade itself belongs to the ADI. THE GRADE COULD BE PRINTED ON THE BADGE.

Most people make their choice through recommendations or word of mouth. As stated in Q16 Having an ADI's grade available won't make any difference. If an instructor is 4,5 or 6 they are deemed to be capable so that doesn't need to be shown. Pass rates are contentious. Even the best students mess up on test due to nerves, or the actions of other road users, so that doesn't need to be shown either,

Pass Rates DO NOT contain any useful information and will lead to ADI's 'cherry picking' customers from more affluent backgrounds who are more likely to be better educated generally and who are more likely to take a greater number of lessons. Furthermore there is NO requirement for ADI's to display their licence when presenting someone for test and it will lead to them being more selective about when they do this or simply not displaying it at all skewing figures and generating no useful statistics. Many ADI's specialise in teaching those with learning difficulties or handicaps who perhaps have lower pass rates (assumption). I am also

doubtful that the DSA can provide statistics that are updated quickly enough to be meaningful. We all see the Test Centre Availability statistics which NEVER reflect the reality of the availability of tests.

See above. My pass rate over 28 years is: ? last year? this year so far ? the last five tests 80% ,how many first time?

The grade of the ADI ☐ Additional, relevant qualifications - eg DIP DI ☐ Location / coverage ☐ All contact details - incl tel numbers, email and websites ☐ Maybe experience / years qualified? (Not sure)

Length of time as an instructor

How long registered

recommendations is best

Where they live

When qualified, Pass rate, and locally to them.

Nothing this could damage ADIs business ,

Cod, experience,

Other benefits of their business, not just cost or CPD or location.

Particular areas of expertise and specialisms.

I do not think it would be right and fair to publish Instructor Pass Rates as the performance of candidates and examiner decisions are out of our hands during the test!

Basic business information and grading of the instructor

what CPD the instructor has completed. ☐ anything that will promote the dilligent instructor and weed out some of the chaff.

Length of time as ADI ☐ Member of any associations

You can't make anything available other than that they are qualified, pass rates mean nothing, some ADI's drop bad students as they don't want to have high risk of having a fail so pass rates are no true record of competence. Just confirmation that they are a registered ADI

Instructors commitment to CPD. their skills and qualifications i.e advance, auto, off-road, disability etc

The ADI grade, their locale, and if signed up to code of practice. Ignore Cpd as this is meaningless, as many people will not understand the concept, and it is not policed anyway.

Feedback from examiners at the local test centre. These people see the standard of candidate being presented for test, regardless of pass/fail.

Am happy to include all contact details held by the DSA and also make pass rate data available as long as it has an explanation attached not just a number.

perhaps make it clear that if you want young drivers to be safe drivers the average of 50 lessons is what is the norm and not 15 lessons like their parents think they need

The grade, how long an instructor, that they are fully qualified

Only advertise ADI's

Historically the DSA's records have often been inaccurate, and the public generally do not use the DSA as a means of seeking information about instructors. The information the DSA provides about an ADI should be primary data, e.g. the date of entry to the Register, the categories of training they provide, their location. The DSA should not publish without prior consent from the ADI any information on Pass Rates or Grade, as these are either fluctuating or subject to circumstance.

I think name, contact number and grade, Also possible pass rates?!

Name, Address, any complaints made.

That they are CRBd, on the register, follow the code of practice, post code, qualifications and cost.

Date of entry to Register, categories of training provided and location. Pass rates are not

necessarily an accurate guide.

Particular specialties: eg. teaching disabled pupils or nervous pupils. However, for the ADI to have this information published it should be supported with some evidence; recommendations etc.

The ADI qualification should be all the general public need to know. You are in danger of discriminating against ADIs and breaking the law if you publish information that the individual ADI does not agree to.

what there is already

None

Grades, and an explanation of what they mean.

Whether the ADI specialises and which areas of the market they are best qualified to focus on

Training and qualifications, ADI grade. ☐ Any CDP since initial qualification.

Doesn't concern me

As now with the 'Find an Instructor' service. Anything more is either vague or open to misinterpretation. Standards check grade depends on 1hr of teaching in a 2-4 year period. Keys are pass rates v number of lessons / customer satisfaction / value for money. Personal recommendation is paramount, without which I think people go for a trusted brand, but some will always go simply for price but may not get overall value for money. A difficult one!

grade, last test date.

Leave things as they are and let market forces prevail

Only quantifiable info such as Instructors grade.

Marketing info should be avoided

ADI Grading needs to be more visible to the public though pass rates can be misleading as even the most competent drivers suffer from nerves on the day of test. ADI's training in certain areas have pupils who limit their training due to budget constraints.

Length of time on register.

not only grades but test pass rates and also at each test centres

location, contact details, years experience, manual/automatic transmission, additional (e.g. special needs instructor)

This would be difficult as when we used to receive our test results it was always wrong. I would not trust the DSA to keep up to date with ADI information.

All my work does come from Recommendations, and all my Welcome Packs sent to or given to my clients they are fully aware of all my qualifications. I think more emphasise on information available to parents would help, or more IT Marketing for the youngsters we teach, the more information they have the more options they have, but really if you think back to when you were 17 did anyof it matter?

any information made available should not have any impact that could have a negative effect on an adi business

Length of service type of car, area, customer feed back,pass rate

Instructors grades should be made public along with pass rates but only if it is made compulsory to display their aid badge in the window of every test. In other words that ADI is responsible for bringing everybody to test whether the pupil is theirs or not. This way publishing pass rates would work because the ADIs that currently remove their badge for test escape the responsibility of bringing someone to test who is not ready.

This is something that could be much smarter and meaningful to parents and prospective drivers.

I think it is too big an issue to have included in this consultation simply because there is more to it than simply saying an individual can teach 'nervous' clients.

As with the 'Grading' issue, I think additional qualifications should be quoted but, this would be resisted by those who cannot be bothered...the Grade 4 happy to muddle along.

Again, I think the ADI Associations should have more involvement and clarify what is required and acceptable.

Whether ADI works full- or part-time, and Grade

I personally cannot see how you can give information when you don't know about each individual or organisation. Instructors like myself work hard to build our reputations and the public talk

They are already overburdened with information. All my pupils come from personal recommendation from parents, that tells you all you need to know.

What more do pupils need? Either the person can teach them to drive well or not.

name, contact details type of training delivered

if we improve the standard of qualification be good if the only relevant information the public need is that we are well qualified, accredited and crb checked .Extra skills or pass rates etc. can be covered on commercial advertising

When their last DBS check was, pass rates and maybe check test grade but this will need to be put in layman's terms.

recommendations from ex students

None. There are far more important aspects to an instructor's ability to teach someone than are shown in DSA statistics.

Any information that the DSA has of a ADI should be used.

length been qualified and the ADI grade

I feel that instructors would benefit from a feedback system (policed to protect the ADI from slanderous comments) similar to other online comparison sites

Adis grades

length of time an ADI ☐ Grade, whatever it will be ☐ Pass rate, possibly unfair

Contact details ☐ Grade ☐ Pass rate is irrelevant as it penalises those who deal with special needs clients or may have only a few tests per year.

Grading and not pass rate as whether a pupil passes on the day of practical test depends solely

on how nervous that pupil is on the day.

List of all ADIs in their area and which test centre they use. Type of car male or female pass plus available.

A better publicised grading system.

NOT pass rates as these can be misleading and might encourage some ADIs not to take on more demanding pupils.

pass rate good behaviour recommendation

Pass rates are NOT a good measurement of success, a few nervous pupils and it will change dramatically, working an area where pass rates are low will also effect it beyond the trainers influence, what about the average number of faults per test taken. This could show competence of training as a good instructor would typically have a lower fault score even if the was a fail.

It would be good if ADIs had pass rates although this would be difficult to prove and instructors that focus on more challenging pupils they may be reluctant to provide this information. It is not necessarily a reflection of the instructor's ability either. If the DSA state an instructor specialises in pupils with special needs like dyslexia or deaf people then is DSA endorsing this instructor's ability to teach these students. Is this a route the DSA really want to go down? Facts like standards check grade and when the latest CRB / DBS was done would be a good idea.

Grade and crb cleared, previous history of any issues notified to the DSA

any information is useful if clear and justified. test results are flawed, retention rates are hard to gather, CPD is unregulated, number of learners/FLH/refresher lessons, pass plus and post test training, specialties etc are all open to interpretation.

if an ADI states they specialize in 'special needs' what proof does the DSA have to then state this and what constitutes 'specialize'? an ADI who teaches 100 pupils a year and 3 are dyslexic or and ADI who teaches 3 pupils a year and all 3 are dyslexic?

far too ambiguous and open to flawed interpretation and will lead to yet another pointless, if not dangerous, list

Length of service ☐ ethnicity ☐ gender

Grades

Percentage of successful pupils

A contact telephone number (mobile or land line) and an email address is more than enough. Many work from home and ADIs do not want pupils or parents calling at their homes. If there are issues of a criminal nature then follow the process. The DSA's remit does not extend to promoting ADIs business or acting as an agent. This could become discriminatory. This is for the ADI themselves to work from a level playing field. It should be the ADI to decide what information they provide, given they are running a business.

if the adi is fully qualified .

years the adi has been qualified

if the adi is fully qualified . □ years the adi has been qualified

name and number and area covered

Contact details only.

Either if an ADI is happy to have them published, or if someone has a reasonable request for the information, e.g. they have a complaint about the ADI and need their contact details to take them to the small claims court.

Anything else is a commercial decision for the ADI to make.

pass rates can be misleading, because you could be below the national average, but the best in your locality, or you could specialise in teaching groups of people that have a lower pass rate than average.

Grading - Qualifications (Such as RoSPA, BTEC,PTLLS etc) - length of service as ADI.

We had a FOI request had also spoken to the Information Commissioner and it is up to an individual how they market themselves.

Areas covered, able to deal with behavioural issues, nervous pupils, give post test tuition,

No reference to pass rate but standards check available and explained

The only general information that should be made available to the general public is □ 1) Name
2) Telephone number 3) e-mail if available 4) Manual, Auto or both 5) Areas covered

Name, address, overall grade

A contact telephone number (mobile or land line) and an email address is more than enough. Many work from home and ADIs do not want pupils or parents calling at their homes. The DSA's remit does not extend to promoting ADIs business or acting as an agent.

The ADI should decide what information they provide, given they are running their own business.

This should not include pass rates (too controversial, open to manipulation and encourages a test-centric approach - rather than teaching safe driving for life). It should include qualifications and any areas that the instructor specialises in provided that there is independent evidence to support it.

Current grade of instructor. ☐ Contact details. ☐ Whether or not the instructor is signed up to CPD

How many pupils ADI have taken for a test in last 6 months and how many passes.

once qualified the ADI should be left to market themselves.

Contact details only. ☐ Anything else discriminates against the independent ADI . unless large franchises provide the details of the ADI they are allocating to a customer in plenty of time for that ADI to be researched on the DSA website. thereby giving prospective pupils the same choice they would have when selecting a named sole trader.

GRADING AND PASS RATE

Grade, contact information,

The only information that would be of use, is what grade and pass rates. The problem with pass rates is what pass rate? I.E. 1. Overall pass rate. 2. First time pass rate. 3. What test centre? ☐ 4. What Examiner? 5. Did the candidate have any special needs? these areas must also be given to the public so that they can make an informed decision. There are ADI out there who cherry pick what students they want to teach and take to test.

Pass Rates but they have to be very accurate which at the moment they're not

Years trading,

Length of service

It is difficult to say. Age might be helpful!! Maybe who ever carries out standards test could do personality assessment to provide info on what type of person.

Customers come 2 me for one reason only ... Not my pass rate and not my adi grade, they come because of one thing dsa can't control no matter what you think and that is 28 years reputation!! So publicizing adi info won't make any difference whatsoever so don't bother !!

about what they adi.s offer and follow code of conduct and a line of enquire to unhappy customers

Name, Contact telephone number mobile/landline, name of driving school and email address.

CPD, adherence to code of conduct, Grade, how long ADI has been qualified

Whatever the individual instructor wants to make available it is not the DSA's position to make personal information public

Grade; Experience; Pass Rate including 1st time passes; CPDs.

Name, contact details.

name and address and contact numbers only

Nearest location of ADIs to the consumers and contact number

Just that they are qualified and therefore Approved by DSA.

The DSA is not an advertising agency, so no more than is necessary - show consumers a list with contact details and the length of service as a qualified ADI.

Possibly a standard profile detailing specialist skills. Simply relating pass rates does not necessarily reflect on an ADIs ability especially if he or she works with special needs students.

name and phone number. years experience.

Very difficult to answer because of the difficulty in verifying that all the information is accurate

and up to date

Their current grade - broader qualifications and commitment to code of conduct and CPD

Considering answer to Q17, we think a simply list of qualified instructors together with qualification date is sufficient from the DSA.

The DSA has a "find your nearest" facility but very few ADI's have any pupil feeds from this site, mainly as the DSA does not spend time or money promoting the site to search engines. It is not enough to expect new pupils to think of the DSA or any government website when looking for driving lessons.

The majority type "driving lessons" and a postcode into Google and find numerous commercial websites.

Only if they have a criminal record . the is DATA protection.

Pass rate of ADI as % of pupils presented for test □ Good with nervous/dyslexic/etc pupils □ that type of info

Certainly NOT raw pass-rates at L-Test, for all the obvious reasons, which are well-documented.

- I'm surprised that the Registrar is in a unique position to publish information about all ADIs.

If it's good enough for OFSTED that the gradings of inspected teachers are, by law, NEVER divulged to anyone but the Head Teacher of the school - not the Deputy, the Governing Body, the Union Representative - nobody, then that lead ought to be followed by the DSA - or by whichever 'Agency' eventually replaces DSA.

The ADI world is primarily one which is "price-led" : the general public begrudges having to pay someone to do what they themselves COULD do for their offspring if only the insurance to do it weren't so "damned high"!!

The advice that New Drivers should always ASK the Grade of their prospective ADI and also ask for PROOF of grade should be kept at just that : divulging via the internet on the Gov.UK site or wherever just fires more information at a general public which - if whipped up - probably makes it feel that it has a 'right' to, but which, in the main, remains ignorant as to how to interpret it.

Those who are impressed by higher qualifications will know to seek out higher-qualified instructors if the general point about ASKING is made sufficiently clear via Gov.uk / the current slip included with the Provisional Licence delivery, and which is also made clear in the Licence application pack.

adi or pdi. ☐ pass rate ☐ years an adi

Date qualified as an ADI ☐ In which (EU) country qualified as an ADI ☐ Grade at last standards check

Standards check grade and additional qualifications would be the only fair way. Pass rates etc would not work due to demographics / type of average pupil etc. it would also be abused by the loonies who advertise guaranteed passes. Take a pupil for 4/5 years and Ditch them when it comes near time to let them be tested

AVERAGE LESSON/TIME FOR TEST SUCCESS WOULD HAVE A VALUE*, HOWEVER, I THINK I SHOULD EMPHASIZE THAT TEST SUCCESS IS NOT THE MAIN AIM, BEING JUDGED READY FOR TEST WITH A VIEW TO DRIVING IN THE REAL WORLD IS WHY WE ARE HERE. A CHANGE OF ATTITUDE IN A NUMBER OF PUPILS AND THEIR PARENTS' IS NEEDED. WE AS ADIS GET THE CHANCE TO PERSUADE PUPILS OF LONG TERM SAFETY BUT MANY PARENTS ARE ONLY CONSIDERING THE FINANCIAL ASPECT AND WANT THEIR CHILDREN "THROUGH THE TEST" WITH MINIMUM EXPENSE. CHEAP LESSONS WITH THE MINIMUM OF INFORMATION IMPARTED JUST TO GET THEM THROUGH. AS A CONSCIENTIOUS ADI I FEEL MOST STRONGLY THAT THE RESULTING NEW DRIVER SHOULD HAVE A ROUNDED AND REALISTIC VIEW OF DRIVING, DELIVERED IN THE SHORTEST TIME FRAME FOR THAT INDIVIDUAL. CAN I ADD THAT THIS COULD BE USED IN THE GRADING SYSTEM TOO.

Only that the ADI is qualified, currently registered and the grade. No other industry regulator offers information other than the basics.

Only that an ADI is properly qualified and is on the Register.

The only actual real evidence of successful teaching is an ADI's Pupil's Pass Rate. Most people want to know that you are qualified and that can efficiently get them through their Driving Test.

Sex of instructor. Locality. Whether they specialise eg automatics, foreign language, special needs.

The grade of instructor

Full or trainee licence holder, grade, pass rate

Abilities to deal with specific personal problems/medical/physical/emotional, and any language skills.

The only information you have is pass/fail rates.

All information supplied to the DSA + the past 5 years pass rate, and it should be 5 years not one to be fair

Time qualified, other qualifications, eg fleet registered

This subject is very difficult and can NEVER be fair. It has been discussed many times in the past.

Contact details

For my family and my own safety NONE

Name and location.

The same information that is given about test examiners

Grade

Instructors grade and explanation of grading structure, number of years of experience

Name and phone number only

Length of time badge held. Pass rates can be altered by dumping learners who are hard to teach and only taking those up that are better natural drivers. Unless you are desperate for the work of course.

Publish grades

The only, fair, facts that can be available would be length of time some one has been an ADI. The grading process is so inconsistent this information would be very unfair in the general domain

Time they have been on the DSA register.

Specialities, ie facilities for, and experience of, teaching people with disabilities.

learners and parents already make their own choices usually on recommendation. ADI grades and pass rates are variable over time and vary from area to area and also as to the type of learner taught (EG special needs) so cannot be directly compared

ADI career length ☐ Location ☐ Pass rate

None

THAT THE ADIIS AN ADI.....SIMPLE.

If the adi is an independent or franchised to an organisation,also pass rates

Specialist areas of training, disabilities, learning difficulties etc. NOT GRADES.

Area covered, pass plus registered

None what,s so every, as you could be the best ADI but they will always go with the cheapest. You are trying to re-educate the wrong people

If you are going to make Pass Rates available then it should be shown for all years ADI has given tuition & the local pass rates to be shown alongside for comparison. Also how long & the training route (existing or new route taken) so giving an idea as to how long ADI been qualified.

This is very difficult. I do not think pass rates should be published, even though my pass rate at present is 100%. I take on a lot of nervous and less confident pupils, and my pass rate could change quite quickly. It may be useful to provide information on no of years an ADI has been trading, and whether they are independent or part of a franchise. It is the ADI's responsibility to market themselves efficiently and effectively, not the DSA's

Pass rates ☐ Hourly rate ☐ Adi grade

Some time ago (last time July 2011) I suggested the DSA should put on their find an instructor site those that had signed up to the code of practice as first place in the listing, I was told it was a good idea at the time but nothing happened. ☐ Would the DSA look to charge for this service as a source of revenue in the future. Should there be problems arising form the advertising,paid or unpaid, would the DSA accept liability?

Length qualification held.

Qualifications, cpd, crb, memberships

disclosure of grading.

Length of time instructing. and present grade.

Services offers ☐ Qualifications held ☐ areas covered

The pass rate, years of experience, pushing the need to ask friends family etc to recommend sn instructor

it would be an excellent idea.

ADI's that have been verified as having qualities or qualifications, or approved CPD in any area that is to the benefit clients with any particular special need. ☐ Practical test pass statistics.

I am undecided as to what would be useful and what information would be unhelpful.

Certainly the grading of the ADI along with other appropriate qualifications. Perhaps how many CPD hours in any year that has been declared.

Local driving instructor to parant ☐ Number if years as an ADI ☐ Not sure if the grading side should be shown. Perhaps pass Rate but again this would be shown fairly I am a busy instructor doing over 50 tests a year a part time instructors might only do 10 tests hand pass rate will be higher.

An ADI grade and their pass rates.

Grade, pass rate

Driving background, pass rates.pupil comments

Have general information that can be asked by an interested party but not given unless requested e.g. Pass rate could be requested - reponse would be categories 0% to 40%, 41% to 65%, 66% and above, or "no learner test record". Or, as another example, Length of service as ADI could be requested -response would be between 0-5 years, 6 years to 15 years, 16 years and above. So any given information would be requested by client clicking for that information and also categorised rather than exact details.

Historically the DSA's records have often been inaccurate, and the public generally do not use the DSA as a means of seeking information about instructors. The information the DSA provides about an ADI should be primary data, e.g. the date of entry to the Register, the categories of training they provide, their location. The DSA should not publish without prior consent from the ADI any information on Pass Rates or Grade, as these are either fluctuating or subject to circumstance.

Contact telephone number (mobile/home- with instructor choosing the preference) ☐ Email address.

whether the instructor is fully qualified or trainee

No view.

A NO to pass rates. It depends on your pupil base. I pick up a lot of pupils who suffer from a variety of complaints and also a lot of short notice tests where I have little opportunity to influence driver behaviour. These both adversely affect pass rates as do nervous pupils etc. Furthermore, how can you improve your search facilities when you don't know what my specialities are? Every instructor advertises services to nervous pupils - because most pupils are nervous!

Length of time qualified, no of check/standards check completed without problem

Their customer service skills

None. Pass rates can vary and this is beyond the ADI's control. Volume of tests is no indication of quality. The grade is only an indication of what one person judges over the course of an hour. We have all had pupils that we believe, as we spend so much time with them and are able to judge their performance, will pass with little problem, only for them to 'scape' a pass or even fail, as ADI's we are no different and can be affected by nerves etc.

Too many factors if a pupil fails or passes test for Pass rate to be a true reflection of an instructors ability

The problem with allowing uninformed people access to technical information is the question of interpretation. This is essentially the problem with the grading process, in that a grade represents performance over a 50min (approx) session, thus not necessarily a true reflection of a persons ability. It would therefor be very difficult to provide information which would be of any meaningful value.

Explanation of Grading system, Name and area ADI's cover, type of licence ADI provide training for.

Pass rates possibly, flexibility of the instructor.

i feel that producing grades to parents etc is unfair, on my last tcheck test, i had been very unwell, so this did not do my grade fair justice.

This is a complex area. It is unusual for the regulator to provide information about suppliers of services, in a competitive environment. We believe that this is better left to instructors and schools. DSA should only provide details of those on the register and their areas of operation (eg fleet/specialisms with disabled drivers, etc etc)

do they hold higher qualifications ☐ do they subscribe to CPD ☐ what categories do they teach

if the purpose of this is to help consumers decide which ADI to use, it is difficult to see how the DSA could present all of the necessary information on each registered ADI to help consumers make an informed decision. For example, it is unlikely that the DSA or the ADI would want their lesson prices presented via a government website. So, a bare minimum of information should be shown, which confirms that the ADI is a valid instructor who has a valid licence and has all the necessary mandatory requirements to offer paid instruction.

length of time qualified, any particular group of driver trained, what further training undertaken

what grade they are, are they good with nervous pupils? my worry is that higher grades may pick and choose pupils to keep their pass rates up and lower grades will be left with pupils that may require more help and need to sit test more than once

Just name and phone number if they are on the register then they have passed all the tests, end of....

As it is now. Commitment to voluntary cpd and sign up to code of conduct. ☐ I strongly disagree with publishing the grading because this would lead to cherry picking of the best pupils.

Grades and CPD.

Learners don't look to the dsa for info when looking for an instructor - they either look at cost(wrongly) or recommendations from friends.

The instructors qualifications.

Pass Rate ☐ Number of years qualified ADI

Grade isn't important

Pass rate ☐ Specialities ie teaching pupils who may be nervous, disabled, or have learning difficulties etc

The current situation is that there are students who are receiving training from trainee licence holders (some of which will not qualify) or they have no idea about the grading system or the grades that their present instructor may be. I believe poor performing ADI and trainees are benefiting from this current situation and holding the industry back.

can you make a DSA badge that the adi can place on their website showing their annual pass rate and grade?

ADI Grade & Pass Rate

How many years experience they have. Their grade.

that the ADI is registered with DSA as an ADI.

It is up to the individual ADI what information he/she wishes to make available, not DSA.

Grades ☐ Qualifications ☐ Experience

I think if an ADI is registered for pass+ specialise in nervous pupils speak more than one language etc these things would be of use to potential consumers

A contact number for home or/and mobile phone and an email address should be enough details for potential consumers..

Qualifications held, but not necessarily gradings or pass rates as these can be misleading

Sadly however ADI's are trained and graded the thing which you have no control over is whether they have a personality that makes the learning experience a pleasant and positive one. I am on the DSA's list of ADI's for my area and I also have my own website which is easily accessible but these generate no business for me. I do not advertise anywhere but despite this

my diary is always full and normally I will have a couple of clients waiting. (£25/ hr) No amount of information on a webpage can give an accurate indication of the experience available and my observation over the years, with very few exceptions, is that those with the most qualifications tend to give a self centred learning experience rather than a client centred one. It has always been my belief that ADI's should be employed by the DSA to ensure a much more standardised approach to road safety and would remove the spurious self appointed experts offering poorly thought out courses to vulnerable ADI's who think they may be missing out on something new when in fact it is normally the case that the DSA make sure we are aware of any proposed changes.

Pass rate , years an ADI, grade, total pupils passed,average no of tests took to pass test.

nothing

Confirm Crb checked ☐ Confirm they are qualified ☐ Pass rate % is not relevant as this is not always accurate!

check test grading

Name and telephone number if ADI gives permission.

What further qualifications they hold , what grade instructor holds and what this means

Grade

The length of time an instructor has been on the register and how long they have held their grade for.

Grade and pass rates could be disclosed providing this was balanced alongside average pass rate for the local test centres in order that these figures could be compared against otherwise an ADI with a 53% pass rate (10% higher than the national average) would be considered by a parent as poor when in fact they were better than most.

I know of 6 ADI's in my area who have ticked that they do CPD but they don't. I run a local cpd group and have additional qualifications I would like these to be made available.

Location and areas covered. Nothing more

Do not believe that people have any particular information that they want or need other than

possibly male or female instructors.

pass rates and average minor faults

The ADI's commitment to CPD, ADI related qualifications and pass rate.

Any civil enforcements/criminal convictions.

Pass rates

Grading, experience, CPD,

ADIs should be able to select which personal data is released to members of the public, i.e. company address, telephone number, grade, website, etc. They should also have the opportunity on demand to change which details are published.

Website details & reviews. Cpd training attendance & any advanced related training.

Adi crb checked and experience.

The public are not interested in information about ADIs - They work on recommendations. Information about ADIs published by DSA is used by commercial organisations to sell to ADIs and DSA need to address this. Indeed DSA MAKES MONEY by selling this personal data (intended for people learning to drive) to commercial organisations. That said DSA could actually make the public and businesses aware of the FLEET register. DSA charge Fleet Registered ADIs an additional fee £120 for a badge but do nothing to promote the fleet badge amongst businesses by making the existence of the fleet register promoted. DSA needs to protect ADIs who meet this criteria and qualify for the privilege of being on this register.

How many years been teaching.

None

Any information on the disclosures

Time qualified whether they actively take part in, continual development, additional qualifications, dsa assessment grade. Location. Sole trader or running a school. Tel nos and website info.

Level of experience, any specialist training,

Other qualifications gained as an ADI

Leave as it is. Most people are only concerned about the price . Giving out information is not the way forward . We have to teach all sorts of people some take a long time, some don't . Getting work is hard enough without giving confidential information out. Someone may take three attempts to pass, but could be a great driver, and suffers with nerves, doesn't mean that we are bad instructors, but that's what people will think. Please think again

APPROVED OR NOT THAT SHOULD SUFFICE

All adi,s on the register are equal .to do what you are proposing would seem you disagree,and as such violate impartiality. Isn't that a breach of right. And violation of the much vaunted data protection act.

We consider that the public should have our name and ADI number. Everything else should be left to the individual or business to provide.

In terms of basic information, we believe it is sufficient to supply the instructor's name and ADI number.

However, as a matter of general principle, The DSA has a crucial, and to some degree unfulfilled role, to play (alongside national associations like DIA) in educating the public as to what good quality driver education and what a good quality driver education provider (i.e. the instructor or driving school) looks like. The misinformation (total lack of information in some respects), and lack of understanding of the value of driver training as means of acquiring an important life skill, is an issue for the entire profession – and for road safety in general.

Making the public aware of what good quality instruction looks like would help with the regulation of poor quality providers. If you know what good is, you can more easily recognise what bad is and the public will be able to regulate in some ways themselves by choosing quality providers, and fleeing from poor quality providers – as has happened in financial services. At the moment the public are not able to make fully informed judgements of the value and quality of driving instructors so therefore default to price led decision making.

Changing the way trainers initially train, qualify, develop competence (and are regulated) is an opportunity to build a better appreciation of the profession in society's eyes, if done properly, and if the public are effectively communicated about any positive change.

We would be interested in **further discussion** on this subject. However, we were shocked at the statement in the consultation document that stated: "Some pupils have particular needs when it comes to selecting an ADI, eg they may be looking for expertise in supporting very

nervous learners.”

All new learners are nervous, all driver trainers support them. This document would appear to have been written by someone who has never taught a learner to drive or they picked a very silly example.

A contact telephone number (mobile or land line) and an email address is more than enough. Many work from home and ADIs do not want pupils or parents calling at their homes. If there are issues of a criminal nature then follow the process. The DSA's remit does not extend to promoting ADIs business or acting as an agent. This could become discriminatory. This is for the ADI themselves to work from a level playing field. It should be the ADI to decide what information they provide, given they are running a business. We do not agree with an instructor's grading being made public information for the reasons given in Q16.

If the purpose of this is to help consumers decide which ADI to use, it is difficult to see how the DSA could present all of the necessary information on each registered ADI to help consumers make an informed decision. For example, it is unlikely that the DSA or the ADI would want their lesson prices presented via a government website. So, a bare minimum of information should be shown, which confirms that the ADI is a valid instructor who has a valid licence and has all the necessary mandatory requirements to offer paid instruction.

Feedback on question 20

We propose that an ADI whose registration has lapsed for more than 12 months should no longer be required to re-qualify but instead undergo a standards check, soon after re-registration (paragraphs 113 - 114). How strongly do you agree or disagree with this proposal?

apart from illness why would an ADI let his registration lapse ?

No actual specific timing. How long after 12 months has elapsed is acceptable?

I agree as if they are at the standard they need to be they qualify, if not then they could arrange further training

After 12 months they should have to re qualify.

This should depend on why the reg has elapsed, ie has been involved in road safety or other transport training.

Instructors need to consider being an ADI as a profession not just a paid hobby to pick up on weekends/evenings on casual basis.

If the examiner does role play then a standards check BEFORE re-registration

when i started i took over from a man who stopped and then had a bad leg which stop him working new job but could not return to instruction without redoing test so he didn't.

I believe that they should have to retake some type of refresher training followed by a standards check, unless it was for health reasons that could be proved.

They've done the training, why make them do it again.

Why did the registration lapse? If it lapsed then the whole process should be done again, after all if your membership the the gym lapses you have to pay a joining fee again.

There are times in a person's life when there may be a need to come off the register so, provided this isn't associated with any criminal activity, ADI's should be able to return to their

job, on the understanding of undergoing a standards check soon after re-starting. This is likely to ensure the ADI takes some form of refresher training voluntarily.

Yes would help ADI's return. But only if they had a good record before.

This would be useful and flexible for someone that is wanting to start a family and take some time out also if they wanting to travel or even if they were ill (ie cancer) and needed the time. I always felt it was not in line with other professionals (like a teacher) that if they took time out they didn't need to go back and qualify.

I think this is a good idea, the standards check should be enough.

standards check should be multi qualification, LGV registered or ADI should have a combined badge and a test or standards check covering one should work for both, I am on both registers and it costs a fortune to stay qualified. Test me on what I do most, truck most of the time and the odd car pupil.

Because of current economic state some ADI's have taken other work. It would be unfair that they have to go through the whole process should they choose to return.

makes sense

This would work very well provided the ADI has kept their knowledge upto date

As with most professional activities, you never lose it. It might just need refreshing.

Best way forward and may entice instructors back in to the fold

Re-qualification shouldn't be necessary but standards check should occur before entry back onto the register

They should have to undergo standards check BEFORE being allow to resume training learners for financial reward

This sounds sensible. If seriously injured, it is quite possible that a good instructor might need to take time out and not be able to afford re-registration/comply at the time but may be able to at a later date. Re qualifying would be a waste of time, expense and potentially a good instructor.

Yep, bring it on.

Anyone who has qualified before knows how to pass the tests so a check test of their ability is all that is required.

Some very good ADI's are forced out of the industry due to market forces, or other reasons. To go through the entire 3 part qualification process again is both expensive and quite draconian.

makes sense for once

Very good idea

However if the standards test returned as unsatisfactory, the ADI should be able to book another standards check within a reasonable time (1 month?), if still unsatisfactory, have to re-qualify

This is a great idea and allows for a more realistic re registration process.

How come you let ADI's from other EU countries teach in the UK . when our roads and driving practices are so different from the rest of Europe .Do you propose a check test for them??

They should have to re-qualify.

Re qualifying should not be a problem for a good ADI ?

This would be good however because there is no relevant knowledge test to take prior to this I have to disagree. I understand that a qualification is for life but industry's move on and for that reason there should still be a relevant knowledge theory test prior to registration.

Standard Check before re-registration

Agree but I feel that dependant on how long the qualification had been lapsed they should complete set periods of CPD eg under two years 10 hrs of CPD, between 2-4 years 20 hrs etc.

Many instructors I have spoken too sometimes want a break from teaching and let their licence expire but cant start up again as they have to do the whole route to pass again. I believe a licence for an ADI should be for no more than a 3 years and then should they wish to continue can request a check test to be re-registered for a further 3 years

But the limitation should still be 3 years maximum

that's more like sense,as a lot of good quality adis are leaving the industry ,due to the pricing that newcomers charge,and they then find it hard to make a living,but in time may like to come back.

The current process seems a little harsh

There would be no incentive to maintain qualification. ADIs could let their registration lapse without penalty.

A standards check would quickly tell if they have 'lost' the skill to teach.

Some instructors may need "time out" for personal reasons

This is a very good idea and leaves the door readily open for people who enjoy and are good at the job but find they need to cease working as an instructor for a period of time (e.g. to bring up a family, need for an increased income, etc) but would otherwise return at a later date (e.g. after the children are at school, semi-retirement, etc. I think this is becoming increasingly necessary as there are an increasing number of full time instructors leaving the industry owing to the decline in people learning to drive coupled with comparatively low income, anti social working hours and increasing living costs and I strongly believe that this industry is returning to being a semi-retirement activity and especially for ex police and military.

I think a simple standards check would suffice, and satisfy all parties

This should be the other way round. Passing of a standards check should be the route back to re-registration.

Their core knowledge should still be with them, so a standards check should be sufficient. Another option would be a second cut off point of 5 years when re-qualification would be required.

How long a time lapse will be allowed ie 3 years?

This should only be allowed within a specific time frame, such as 24 months as the skill base for a living instructor erodes quickly without constant use

There are many instances when good ADI's have been forced to seek alternative employment for a period of time in order to feed their families. These dedicated individuals often intend to return to the industry at a later date when family expenses (mortgage etc) have diminished. Currently, in order to be able to do this they must continue to pay the extortionate registration

fee in order to be constantly scrutinised and tested by the DSA whilst on an essential lengthy sabbatical.

Up to maybe 5 years

A time limit is still required - perhaps 5 years is better. My concern is that changes as proposed means and ADI can leave the register for 10 plus years and then come back without any update training.

I would suggest they have to pass a standards check before re-registration and the check should be paid for by the 'ADI'

If the instructor isn't bothered about keeping their registration going, are they to be allowed to come back at their whim?

If an ADI registration has lapse they must re-qualify

Brilliant and far more realistic

With the declining market swamped by ADIs, some very good ones are leaving as they can't compete against the 10 lessons for £50 lot. If conditions improve, it would be good to make it a bit easier for people to return.

This would be much fairer for an ADI who had to stop working temporarily through ill health for example.

The absence could be because of ill health. to penalise them for being sick would be unfair

We would be in favour of a 24 month period. This answer is personal as I'm currently under going Chemotherapy treatment. I cannot teach at present, however, being able to say I am an ADI as opposed to unemployed is vitally important to me.

A fair policy to undergo a standards check as the lapse could be due to a valid reason, ie illness

if they have been out of the game for that amount of time then they should be made to reset the exams

There has to be a limit as to how long it can be lapsed before it becomes obsolete. For example, Any more than three years is too long without full retraining

I think that us much fairer

Agree but what about a adi who may be long term sick?

Yes, if re-registration process involves a simple tick box exercise.

But should still be a time limit after which requalification is required

ie ill health

Plus a theory test.

If have no valid excuse or reason than if they where too lazy or negligent to make sure it does not lapse than they deserve to be struck off and made to re qualify / considering that we must always display a valid license for driving/it should be professional and correct to display a valid ADI/PDI Badge

On the evidence of trainees going through training it is in some cases essential in all cases desirable that they revisit their knowledge and skill set. Training is not mandatory, evidencing knowledge and competence at all three tests is essential.

they should be allowed to get there licence back with the right training they should re qulify straight away

Yes But not soon after re- registration. You should have to do a standards check to re qualify instead of all three original tests. One test must be done to re-qualify or the public may find an awful out of practice instructor

methods and laws change on a regular basis , after 12 months are you teaching a good standard ??

This happened to me and it was just time consuming having to retake the exams.

It does seem ridiculous that currently after 12 months the DSA thinks that an ADI has forgotten what they have been doing for years.

these people cant do it now never mind give them a 12 month break you really must be joking

I agree with this. This makes more sense than to having to start the process all over again

Thanks - no money in that for a training company.

There are many reasons it could lapse. Cost of training should not Be needed again

But should also therefore include re-registration to the register of approved driving instructors

Its a fairer system if someone unfortunately was taken ill and had to be off for a long period of time

Should be regarded as an opportunity to demonstrate retained skills.

dependant on reasons for lapse of licence

What other professions require requalification after a years sabbatical

an ADI may only have lapsed for 12 months but another may not work for two years but keep their registration up to date so it isnt fair to make them re do the qualifying process

They should have to re-qualify. There are people out there who have never been ADIs who could pass a standards check, so should they also have the option? Furthermore, there are ADIs who have been idle for longer than that yet are still on the register and these also need picking up somehow.

This does seem sensible, as far as it goes. Except of course that the Standards Check (aka Check Test) is not, in itself a valid estimation of a "normal" lesson!

This makes far more sense.

The standards test will take care of the poor ADIs

unless through illness of their own or family, the question should be asked why they lapsed in the first place. If was due to lack of business, the question should be asked whether they were good enough in the first place.

Standards check would not prove driving ability etc

Skill fade

Seems fair enough.

If the ADI licence is expired more than a year they should have to be retested in all elements. How long after ADI registration lapses or failure to complete a check test would you allow just a standards check? ?

The qualifying process is already complex and expensive to undertake. So to do it all again could put a good instructor off doing it again because its simply too expensive. Also just because 12 months has elapsed doesn't mean that an instructors knowledge or a ability is diminished to the point they cant deliver instruction to a high standard.

If they have the skills they wont lose them

The standards check should be before re-registration

This makes complete sense

It could have been for medical reasons, so beyond their control

I cannot see why an ADI would leave it more than 12 months except for exceptional reasons, those being a bereavement of close family member (Wife, Husband, etc), or a health issue. Only for those reason, would I say that they could re-apply then have a standards check shortly after.

that sounds good.

There is a need to bring any returning ADI upto today's standard

I think 12 - 24 months would be fine, but longer than that would be too long. If an ADI thinks they may wish to re-enter the industry they should complete a Standards Check after 12-18 months out of it and again when rejoining.

It seems unfair that an ADI is not a life long qualification like many other industries

Such a check needs to be rigorous enough to identify loss of form/knowledge/skills/attitude that such a long 'layoff' could produce

Out of time to means out of date so re-qualification is necessary

I think this should depend on how long the registration has been lapsed for. Perhaps up to 2 years a standards check is appropriate but anything longer would require re-qualification.

If it lapses re-qualify.

Maybe 18 to 24 months

Ill health circumstances may bring on this situation so I personally think that would be the best option to that predicament. It is fairer to the ADI concerned.

Very good idea

If the standards check does its job properly then it should be more than adequate in assessing whether an ADI is still at an appropriate standard to remain on the register. It perhaps should be undertaken within a very short period after re-registration though.

There may be valid reasons why it has lapsed, or just a career break has intervened. As long as the lapsed ADI shows the required standard, then why not?

Good idea. If someone takes a year off they shouldn't need to re-apply from scratch.

depends on how long after 12 months

Depends on circumstance

That seems logical.

Some ADIs leave the industry for economic reasons but would like to go back to teaching, they shouldn't have to do the whole qualifying process again but yes a standard check is a must prior to giving paid tuition

Whether that is appropriate would depend on why the registration lapsed so both options should be available.

There has to be a time limit. 3 years would be fair. That should take into account any ADI who

has been off on long time illness for example.

This is fair.

Allowing a registration to lapse may have happened for any number of reasons, mainly illness/financial, having to re-qualify adds to any financial pressure sitting a standards check would remove this and encourage anyone looking to re-qualify

covers people who have been ill

It is wholly and utterly wrong that those ADIs and DSA Registered Fleet Driver Trainers living and working abroad as Driver Trainers should be allowed to re-register without any Check Test/Standards Check. A number of my colleagues who live and work abroad as Driver Trainers freely remind me that the DSA renews their Certificates without any requirement for a Standards Check. If they wish to have their Certificates renewed they should return to the UK to be checked by DSA. I have lived and worked overseas as a Driver Trainer; it is very lucrative work and anybody who tells DSA they cannot afford the money (or the time) to return for a Standards Check needs to reflect and consider their position. I doubt very much whether the nations in which they work are aware of the requirement to be checked by DSA in order to retain their Certificates.

We still need an upper limit, perhaps 5 years.

They already know what to do, additional training and a standards check is fair

Some instructors need time out for various reasons,family illness,change of working area,etc

There should be some cut off, maybe 5 years

Something out of the persons control may cause them to be off the road for 12 months. ie family/personal illness. (Not a driving ban)

There must be a maximum time limit before requalifying

I think that's a great idea. Especially if someone has had a long illness.

Except for reasons of illness or incapacity.

illness or need to work at other priorities in life can cause down time in training so a standards

check on re-entering the arena would be good

No, if they don't renew their registration then they obviously don't want to be an ADI - this proposal is watering down the professionalism in my opinion

Is there going to be a maximum time limit ?

due to the ever changing nature of the business a lapse of 12 months will be too much of a break to be seen as still qualified

Only strongly agree if that instructor has a good reputation both with the DSA AND his pupils in the past, ie there have been no claims against him in any way

If the application is within 5 years of registration lapse,

Maybe extend to three years before re qualification

No Issue. However throughout this consultation there has been no option to mention the new standards check and specifically attending with a student. The reasons given for removing role play seem to stem around candidates not honouring appointment or cancelling at late notice. I would wonder that these excuses given probably originate from difficulty in getting a student to fall in line with the times of the appointment set by the DSA or by the student changing their mind about participation in the check test. The role play has always given the opportunity for the check test to go ahead regardless, and also for the candidate like me who does not have students as they are in a managerial position that requires them to hold ADI.

looking at continuing into retirement and world travel it would appeal to me especially if I new time away from the profession wasn't a problem

Great idea.

Again in other industries once your qualified your qualified for life. (electricians for instance can leave there profession for a number of years then only have to get another job within there industry on the bases of there qualifications) and not have to take any exams that they previously had taken ...

Many ADI's that are registered (for 4yrs) may take a year or two out of practice, then when required, take a check test, and qualify for licence renewal.

if not to standard then retraining required with proof of training provided then retake standards

check

If for some reason (perhaps to medium term illness) an instructors registration has lapsed and they could prove through a standards check that they are still good instructors why make them go through the whole process again.

This would benefit anyone returning to work following a prolonged period of inactivity due illness etc.

Much fairer if an ADI wishes to re qualify after a career break or prolonged illness

This seems like a reasonable option that would appear to be acceptable and relatively inexpensive.

a per could be ill for some time. □ a person could be out of the country

There should still be a time limit but maybe 2 years

If drivers need to keep licence current adi need to come on DSA play the game

this a good proposal as the adi has already passed the 3 exams why do them again!!!

Sometimes family problems or health force a break passing a standards test before teaching should suffice.

Should complete a standard check within 1 month of re-registration, this would allow time to achieve at least the minimum standard until he is back to full instruction level

If They can pass the check then they must be up to suitable standard.

Would there be any time limit for a lapse? If it was only for 1 -2 years then this may be OK. But if the lapse is protracted then they should fully requalify

But give him at least 6 month before the check test.

If an ADI has allowed their registration to lapse for more than 12 months, obviously they have not been providing tuition. Therefore, I strongly believe that re-qualifying is necessary in order to maintain the high standards required for Driving tuition.

They should get further training which would get them thru' the standards check

All checks and testing should be done before teaching.

Far too arbitrary, the reasons for lapsing are manifold, and include illness; Automatically lapsing the ADI qualification would be punitive.

An ADI may wish to take a sabbatical for various reasons, eg voluntary overseas work

Make it 2 years

Why would a former instructor need to start from scratch. A check to maintain they are still capable is adequate. Would be very useful for any instructor taking a career break

This seems much fairer than the current system.

The ADI qualifying process is a long and expensive process. An ADI can be properly assessed in a standards check. What is worth consideration is that if the ADI has been out of the game for more than 12 months then give them a longer standards check. A bit like the extended test for pupils but from the angle of their positive development

A working ADI who needs to take time out would not let their registration expire. Commitment means staying on the register not coming and going and faffing about. I disagree with that. If you are too ill or similar to take a check test then concessions should apply but otherwise leave it as it is

have a check test to assess their suitability to become reregistered before granting a new licence.

This proposal focusses on the main aspect of ADI performance that might be in question if an ADI has been outside registration for more than 12 months

It all depends on circumstances really. I think ADI's in such circumstances should be interviewed where an assessment is made and an action plan agreed as to the way forward for re-registration or otherwise.

I strongly agree that once they are accepted that they are eligible to rejoin the register, a check test should be sufficient to show competence.

This seems fair

Started the Driving Examiners course at Cardington but understood that I would lose my license so resigned.

Unless registration has lapsed due to health reasons.

An ADI should not let their registration lapse for that amount of time unless there are unavoidable circumstances. By making the ADI have to go through the whole qualifying process may very well make them less likely to let their registration lapse in the first place. By making it clear that not only a standards check would be needed then I strongly think that ADI's would respect and value their certificate more.

This would be a great boon to ADI's who have experienced long term illness.

A 'return to work' re-training course should be compulsory. before taking a standards check.

As long as the check is within a short period after re-registration

This would be very useful if I take a short career break to bring up my child.

Shouldn't be penalised in this way, standards check suffice to determine the level of competence

even if it's for a long term illness.

Extended check test -depends on how long they have been out of the industry.may need a cap at about 2 or 3 yrs.

An ADI that registration has lapsed for more than 12 months, should go through some sort of retraining, refresher.

If the ADI has been out of the industry for a number of years then they should have to undergo some form of training to bring them up to standard on all aspects of delivering training and understanding the changes within the industry.

The check test should determine an ADI's competency to deliver training rather than having to re-qualify. However, we are concerned about the definition of "soon" in the context of taking a check test after reregistration. If it is a number of weeks or months after reregistration before an

ADI receives a check test there is the possibility that the ADI could be offering training to learner drivers, and taking payment for this, but may be unfit to do so. We feel that an ADI should not be able to reregister until there is confidence that he or she is fit to be on the register. However, given the registration fee payable, it is assumed that the ADI would not make such a financial outlay without some confidence that they would pass a check test.

It would mean you could dip in and out of a career. Without losing the hard earned qualification.

If an ADI falls ill and is off work through Maternity why should they have to go through all the exams again. If a dental nurse is off work due to having a child he/she undergoes extra training not having to retrain again. It's hardly fair and it would certainly put a competent instructor like myself off going back into the industry.

should be both!

in 12 months the knowledge is tainted and may be outdated as the industry moves forward

Theory test should be done again and standard check cost should be slightly higher rate.

24 month should be the time limit

Depends on the reasons that the registration has been lapsed ie, ill health.

Of course this is a more sensible option. Doing the qualification process twice achieves nothing but revenue generation. Other professions take a career break, why should ADI's be penalised for doing so?

I think this is incredibly important, people will take breaks from work for all sorts of reasons, and they should be allowed to pass a standards check in order to be allowed back on the register. If they cannot pass the standards check then they should have to re-qualify.

MCI feels that in principle, this would be acceptable for instructors who have lapsed for a period of over 12 months

I did have 7 years away from the industry although I maintained my green badge and attended CPD, and remained a member of MSA in that time. When I returned I found things had changed a lot and after my C/T dropped from 6 to 4 and my 2nd one was still a 4. I feel a little more time is needed to 'get back into it' but certainly a need for a S/C at around 6 months.

There are many reasons why an ADI may need extended time away from the job

If a PDI fails Pt 2/3 then they have to wait 2 years depending on their Pt 1 pass date, why not the same, and then a standards check before the licence is re-issued.

There has to be a acceptable upper time limit after which any ADI wishing to re-enter the driver training industry has to retrain to current standards and methods. Do we want an industry whereby ADIs can enter and leave at the drop of a hat? If we are to maintain any sense of professionalism then the DSA ought to be safeguarding standards, not diminishing them.

excellent idea

After 24months then they should re-qualify.

if not been on the register for 12 months then should have to start again.

In any other trade you would not be required to re qualify after an absence

DEPEND ON REASON

Some ADI's may allow their registration to lapse for a variety of reasons. It is an unnecessary administrative and financial burden to repeat the entire re-qualifying process.

I think a time limit would be useful, otherwise someone could come back after 10years and be completely out of touch. Maybe a period between 12 and 24 months can reregister and do a standards check, after 24 or 36 months will then have to re-qualify.

DSA allow foreign country ADI to enter the register without re-qualify, same should to our own ADI.□Of course undergo a standards check so after.□Go ahead

once you are an instructor you are always will be, strandeds check good idea after 12 months

It should depend on the instructors years of experience.

But depends on circumstances eg illness

A sensible idea for once

After 12 months you have not forgotten everything, Training to bring back up to speed and industry changes awareness

If registration has lapsed by more than five years then should have to requalify.

Surely it is no different to any other job, having been originally trained, all you need to do is update your knowledge not go through the whole process again.

Agree BUT the check test should come before re-registration similar to Part 3.

Why would you let it lapse for so long? Illness/compassion could be an exclusion, but if you leave you leave! I think you're being too soft!!

there should still be a time period to match the registration period of 4 years then full re training should take place.

Makes sense

Could be due to illness so a check would be a better approach

As long as the person can prove they are still capable of giving instruction this could work. An ADI might have let his registration lapse for reasons unknown, but wishes to return to his vocation. You don't take someones driving licence away just because they have not driven for a period of time.

Maybe with a restraint on the amount of time since it lapsed.

same should apply to a PDI who has completed part 1 and part 2 of the current scheme

If you don't maintain your registration, you should have to re-qualify

A standards check should be all that is required for re registration but it should be taken as the requirement for re registration not afterwards.

12,mths or less,further to one or more check test's in a 12 month period./

we have no right to take some ones qualification they earned by hard work it's like taking some

ones driving licence if they haven't done any driving for a year?

Great idea STOP grabbing our money

they should have to re_qualify

An adi would have all the knowledge, cant see why an adi would need to pass all three exams again. A Standards check will check his suitability and ability .

I don't see the need to requalify. A standards check would be adequate

There is no real excuse for failing to re register. It shows poor business acumen.

Must be a good reason for registration to have lapsed. Personal or medical

great idea!

standard check to be within 6 months of reregistration

12 months is a fair period.

If the standards check used is very similar, or the same as the example recently punished, that should be sufficient. If any longer than 24 months a complete re qualification might be more appropriate.

If your registration has lapsed I feel this suggests that you were not fully committed to teaching at the time of renewal and in all likelihood had not been delivering a lot of training in the time before renewal. As with any skill if you don't use it you lose it. Therefore retraining would be most appropriate for these individuals.

After 12 months if they have not renewed then they should retrain

However there must be a maximum period that the registration has lapsed...say 3 years...then they should have to re-qualify

This would certainly cut down on expenses for both the ADI and the DSA, and ensuring they have a standards check soon after reregistration would ensure that they are still delivering a high standard of instruction.

An ADI may want to have a few years' break to spend time with a young family. I think if it is a very long break (i.e. more than 5 years, say) they should have to undergo a standards check before being able to instruct again.

As stated in MSA magazine especially for women who need to take time out for having and caring for their family. No other profession needs to re-take professional qualifications after maternity leave.

I'd prefer not to do the whole process again, lengthy and expensive, a standards check would be a fantastic way to get back into it, as if someone has to leave the industry for some reason then is able to come back, they would rather be able to do a check test than a 3 tests they have already passed.

Surely we are trying to uplift quality?

Preparing will be easy for some despite their lessening performance prior to lapse. ie. why let the lapse if all is well?

Again makes sense, how many industries have to re-qualify after a lapse of registration. I know of instructors that have kept their registration up, but never given a lesson in 5 years, and 1 instructor due to health problems had to re-qualify after a 15 month lapse.

If it is felt that the Standards Check accurately reflects performance we can see no reason why this could not be used. However, we would like to suggest this is limited to 4 years and after that someone must go through a re-training course with an approved provider, or show they have been working in an associated area (for example been a driving Examiner) and then satisfactorily complete a Standards Check.

They has to be some checking before an ADI can re-registrar as thing change so much in a year

I agree but I would want the Agency to find out why they want to return especially if they left for no good reason

But if someone re-applies after a lapse of a certain number of years (4/5?), then they should re-qualify.

The phrase "more than 12 months" is too open-ended. If the lapse was between 12 months and 24 months, then there may have been special circumstances in the ADI's life, eg pregnancy or loss of licence for medical reasons, in which case I would support the proposal as the lapse is a

temporary "blip", a sabbatical. However, any longer than 24 months should be by special consideration by the registrar and the length of lapse and the reason would both be significant factors in the registrar's deliberations.

A good idea, providing there is a time limit on it, say within a 4 year period as per the term of an ADI badge. After that they would have to re-qualify.

Fair enough, circumstances!

Agree as a standards check would surely ensure the ADI was still up to the job and would assist many that do leave the industry for a period to enable them to come back without having to re sit all the exams

You never forget how to teach

Many need to take time away for all sorts of reasons, if illness they don't need the added stress of losing their job too

Check test b4 relicence

out of date by 12 months or more re do the qualification unless it is because of illness

The DSA cannot even do timely standards checks now, there is no way they would be able to manage the extra burden of returning ADIs who otherwise would not have bothered.

should there not be an upper limit though if for example if their registration has lapsed for say 10 years lots of changes may have taken place

12 months + ☐ Then re-qualify

This is a good idea.

If an ADI has 12 months, surely that is long enough unless there are exceptional circumstances. Otherwise you may have returning ADIs after a long period of absence, completely out of date and teaching the wrong syllabus. By the time they are checked, it may be too late.

A common sense suggestion

Why incur further admin costs for the DSA, and further expense for PDI. You do not have to take a diving test after 30yrs, so the need to re-qualify.

Have activities in the 12 months had any affect upon the ability to teach? If not, and still capable, why go through a re-qualification process. Each scenario to be decided upon its merits.

However I think if someone has been out of the industry for say 5 years or more they should re-qualify. Things change!

Or as an alternative extend the period to two years. It would be foolish to expect people to still be able to instruct to a satisfactory level after a longer period.

12 months is a long gap, we all get complacent, if we are to improve on Road Safety and teach this we should still be teaching at a high standard, so it's only fair after a lapsed period this should be implemented.

what is proposed by more than 12 months? 18 months ? 2 years? 5 years?

I am not sure that full re-qualification would be necessary... however, I think a standards check is not sufficient. Again, I am not convinced this has been properly thought through or communicated...

My comments are that an instructor maybe on long term sick, may have gone to travel, work abroad. I am a professional ski instructor and sometimes spend a year away.

slightly favour re qualification but could be swayed !

For goodness sakes.... surely it depends on how long it has lapsed??!!!

Pointless to have to start training from scratch again just because of a break in service. A refresher is all that is required.

this will help in long term illness

Their could be many reasons for lapsed registration ADI's should not loose thier ability in 12 months.

A short refresher course should also be required

There needs to be a time limit after which the ADI needs to requalify.

I would like to see a SC during the first 6 months after re-entry onto the register. Those who have been away for more than 4 years should take a SC before being re-entered onto the register. We would like to see 12 months extended to 24 months for ADIs who are grade 4 and four years for ADIs who were grade 5 or 6. An SC will prove knowledge and current teaching methods.

where do you draw the upper limit?

I agree but believe that a standards check should be done prior to re-registration. Re-registration could mean that a lapsed ADI is teaching real learners with no other ADI in the car and no check of his / her ability to teach or knowledge of up-to-date road safety information or test requirements. This is a throw-back to the old trainee licence as there is no check on quality until maybe it is too late.

perhaps bringing in some kind of PREP requirement such as exists for health care workers. this allows them to return to their role within 3 years as long as they have proof of maintaining an interest and keeping updated. evidence of showing commitment to the profession within that time may be difficult to police as CPD is not monitored, but with specific requirements to have attended local associations, national association, workshops and conferences perhaps? Without doing so it is likely that an ADI will pass a standards check so its hardly fair or cost worthy for the DSA to have to recheck failures

A more relevant and less costly process

We would like to see a SC during the first 6 months after re-entry onto the register. Those who have been away for more than 4 years should take a SC before being re-entered onto the register. We would like to see 12 months extended to 24 months for ADIs who are grade 4 and four years for ADIs who were grade 5 or 6. An SC will prove knowledge and current teaching methods.

Surely there has to be a time limit, even if it is changed from the current 12 months. if an ADI lapsed for example for 10 years, they might still have the teaching skills to get through a standards check, but have they kept up to date on everything else?

A more comprehensive test than the standards should be required. Similar to CPC.

Sounds like a reasonable proposal.

A lapsed ADI has already proved that they can teach in part 3 (or whatever it will become) therefore should not need to prove it again. I would agree that they do a SC shortly after commencing to teach again.

Should do a standards check before registration goes through to make sure adi is still suitable

I would like to see a SC during the first 6 months after re-entry onto the register. Those who have been away for more than 4 years should take a SC before being re-entered onto the register. I would like to see 12 months extended to 24 months for ADIs who are grade 4 and four years for ADIs who were grade 5 or 6. An SC will prove knowledge and current teaching methods. We also believe Driving Examiners wishing to return to becoming an ADI should not be exempt from the manner in which an ADI returns to the register.

Agree provided the standards check is carried out before the ADI is allowed to teach pupils for money.

Hypothetically an ADI could have let their registration lapse 45 YEARS ago so should not be allowed to re-register. A time limit must be set, as the profession evolves over time, hence why the DSA are for consulting over changes to the qualifying process. It would be unfair to allow an ADI who practised this length of time ago to rejoin the register only to be removed at the first standards check.

I think there should be a time limit on how long the registration has lapsed for, and possibly it should relate to previous check test or standards check grades. Also how "soon" is "soon after registration"? A low grade ADI who had been off the register for a few years should not be allowed to go straight back to teaching, unless the standards check was done almost immediately

I would question why the ADI has let his registration lapse. After all registration is simply remembering to pay a fee by a certain date. It does not prevent an ADI from taking an extended period of leave or sabbatical. The risk here is that the ADI is simply letting the registration lapse for financial reasons.

No comment (agree)

It does not seem wise to allow that after an indefinite period of absence from driving tuition the resumption of paid tuition should be allowed without any form of check upon the person's ability. Equally, the current 12 month period is too short. It would be more practical to suggest a three year period, given that an ADI licence covers four years, after which a part 3 test would be

required before an applicant was allowed back on the register.

they should have to re qualify

Can't see the advantage of this really, if you Want to keep up your badge in the first place go for the test.

Competence should be recognised not meaningless edicts.

A simple standards check would immediately indicate whether an instructor was still up to standard or not. Anything else would be a money making scheme.

There must be a cut off limit perhaps 2 years but to allow an ADI to have a standard check they must be current in their dealings with the driving industry and this could be abused. There are not enough ADI's re qualifying for this to be a problem

What a nonsense that a lapsed reg by only a few months means the whole thing over again and the expense ,,,

It might be appropriate to put a higher time limit. ie what about 3yrs off the register or 5yrs. At some point requalification might be a suitable requirement.

If an ADI had lapsed 2 years maybe but for 5 or 10 years he needs to requalify in my opinion. If the ADI is up to standard this should not be difficult

Leave's the door open for ADI's to come and go.

It depends how long they have been lapsed for, if they have been off the register for more than 5 years I would say start again completely but less than that then do a standards check.

How long a period would this be for, are you considering allowing an ADI who had lapsed 10,15,20 years ago back onto the register on passing a standards check?

I believe there should be a minimum of a year to be able to re-register or under exceptional, two years. Perhaps retake the Theory Test between one and two years. between three and four the whole qualifying process.

Given the terms of the lapse an extended check test would be fine. Given the DSA examiner will probably be aware of the candidates previous pupil standards

Yes, preferably within 6 months. □ For those that have been away for more than 4 years, then Standards Check prior to being entered. □ Examiners returning to teaching should not be exempt either.

Always seemed a bit harsh to me!

It would depend on how much longer than 12 months. Its a "tricky one"

the issue of the timing of the check is important - and there does need to be an eventual time limit. For example - after 15 years, could an ADI just re-start, with a standards check in 6 months time? We believe there will need to be a "cap" on the time period (possibly the same as a registration period?)

No. We think it is dependant on the period that has been lapsed. If it is more than 2 years, arguably the ADI will need more than just a standards check to ensure they have the necessary level of competency. It also depends on what you mean by "soon" after re-registration. Even a small time window opens the possibility of pupils being taught by ADIs who are not up to the task. Given the small number of ADIs who are affected by this issue, we do not think the DSA should relax the standards and would suggest some time-limited rules as follows:

- o Less than 12 months – ADI allowed back on the Register (subject to usual checks)
 - o Between 12 – 24 months - a standards check is conducted (and paid for) before the ADI is allowed back on to the Register
 - o Longer than 24 months – ADI must re-do all the training in full before being allowed back on the Register.
-

it would depend on how long they have let it lapse , I feel there has to be a cut of point can't be too long

Instructors leave and come back for all sorts of reasons ie illness. I wouldn't want to worry about re-qualifying if I was lying in my sick bed

25 per year out of 45 000 would appear to be a very insignificant number. I am not sure of what reasons 25 ADI's each year fail to re-register.

But there must be a time limit of some sort,

Yes, the SC should be implemented to re-registered ADIs instead of re qualifying

The standards check is only a small snapshot, this wouldn't show how good overall the adi has kept their knowledge updated with any changes

will be useful as the person has paid a lot of money to get their badge

An ADI who for personal, social or health reasons has been unable to continue instruction and has then been able to return should not in fairness have to re-qualify where a standards check would confirm if that ADI was still of a standard to give instruction

As an ADI's continued registration is subject to a regular check of their competence (via check test) it makes no sense that an ADI, whose registration has lapsed, should go through the whole process of re-qualification if they can prove (by passing the check test) that they can do the job.

Simplification of process must save money.

Although leaving the industry for any period is very unlikely to improve someone's ability it should not require a full re-take of all exams. An experienced DSA examiner would be able to assess the competence of a returning candidate.

We believe there still needs to be an upper limit for this, which we would propose is set at 10 years. Rules, regulations, guidelines and instructional techniques evolve over time. For example, we would strongly oppose an ADI rejoining the register after a break of say, 30 years after simply passing a 1 hour Standards Check. As well as an instructional assessment, it should be a mandatory requirement that ADIs out of the industry for more than 10 years have their theoretical knowledge and driving skills reassessed before being allowed re-entry onto the register.

There would have to be a maximum timescale

Whether the ADI re-qualifies or has a standards check should be decided by how long the ADI has allowed their registration to lapse

An ADI should be allowed a two year window to reapply, no longer

Good idea. Means some top grade adis who quit for whatever reason can jump back into the hot seat. Ps don't mean those graded by dsa.

We **STRONGLY AGREE** with this proposal.

We agree with this proposal in principle. It is a more practical assessment of a professional's fitness to practice and more efficient use of time and funds for both the ADI and the regulator.

However, there needs to be a measure of common sense applied to this as we cannot perceive a situation where an ADI who does not practice for a prolonged period can simply re-enter the profession with no retraining, or updating of skills and knowledge (which are conceivably out of date after a long break from being in the role). Some other vocational qualifications do require a requalification or refresher qualification after an absence of 3 years or more from active practice, rather than just a competency assessment in isolation.

We **agree** with this proposal and have been pressing for this for this "lifetime qualification" for some time.

Slightly agree. We would like to see a SC during the first 6 months after re-entry onto the register. Those who have been away for more than 4 years should take a SC before being re-entered onto the register. We would like to see 12 months extended to 24 months for ADIs who are grade 4 and four years for ADIs who were grade 5 or 6. An SC will prove knowledge and current teaching methods. We also believe Driving Examiners wishing to return to becoming an ADI should not be exempt from the manner in which an ADI returns to the register. We also would point out that with trainee instructors no longer able to give lessons for money unless accompanied by an ADI, we sincerely hope this proposal is for the right reasons and not for large training organisations to use trainee instructors as franchise fodder by bringing back on to the register retired ADI's to "sit in the back" to enable trainee instructors to "make a living" rather than to gain experience. We broadly welcome this but are **VERY** sceptical as to the real reason for it. We have long memories of things that the "industry wanted" such as getting rid of the one to one training ratio for the favoured few large driving schools which produced an increase in trainee licences from 1500 per annum to 7000 per annum in one decade. The results of this were disastrous. We had a situation where only one out of every seven PDI's made it onto the register. That was a disgrace.

No. We think it is dependant on the period that has been lapsed. If it is more than 2 years, arguably the ADI will need more than just a standards check to ensure they have the necessary level of competency. It also depends on what you mean by "soon" after re-registration. Even a small time window opens the possibility of pupils being taught by ADIs who are not up to the task. Given the small number of ADIs who are affected by this issue, we do not think the DSA should relax the standards and would suggest some time-limited rules as follows:

- Less than 12 months – ADI allowed back on the Register (subject to usual checks)
- Between 12 – 24 months - a standards check is conducted (and paid for) before the ADI is allowed back on to the Register

Longer than 24 months – ADI must re-do all the training in full before being allowed back on the Register.

Feedback on question 21

We propose that the legislation should be changed to allow the Registrar to remove an ADI from the register at their request (paragraphs 115 - 116). How strongly do you agree or disagree with this proposal?

Again subject to an appeals process

needs to be sufficient grounds for removal

If you on the register, you are on it. You can only choose to leave the register if you want to leave the profession (effectively retire from delivering 'paid' instruction)

If they wish to be removed, so be it.

I'm at a loss to understand why this can't happen now so I'm strongly in favour of allowing this.

Appears a sensible proposal.

No opinion

makes sense

There are some dubious characters out there who flaunt the law..ie no insurance. If caught..remove them from the register

Why not?????

I can't envisage many occasions where this would be necessary other than to stop the bombardment of junk mail from franchise schools....

Cant see any reason to keep their name on the register if they want it removed.

However I don't agree that for however short a time after a renewal fee was last paid there will be no refund. Some ADIs may have in good faith thought that they would continue for 4 years and they can't due to no fault of their own i.e. illness, long term injury, or their business folds due to lack of work. I propose that 50% of the fee can be refunded up to 2 years into the licence

-- none after that period.

With sufficient security measures, yes

As long as there is a valid reason.

THERE MUST BE PROPER CHECKS AND BALANCES TO ENSURE REMOVAL IS NECCASARY

Why shouldn't people remove themselves voluntarily? I have just done this with my Paramedic Registration as I no longer practice. However if they have an outstanding case against them they should not be allowed to de-register until that case has been finalised.

If its in their interests then yes

If the Registrar has reasons to remove an ADI, the Registrar should be able to do so - if an ADI does not agree an appeal can always be made.

If an ADI wants to be removed, let them.

Why would you want someone on the register who did not want to be there.

Fair enough.

Why not? is possibly a better question

I see no reason to refuse a request from and ADI to be removed from the register

I have no real view on this.

why not

Is this a problem?? How many ADIs ask to be taken off the register?

The current method is silly

If someone wants to leave, why should you be able to stop them.

Of course. Life changes so if you know that you will no longer use your registration then you should be removed voluntarily. Obviously with something being signed making it clear they are being removed. This could be done through irdit?

I see no benefit of making this current administrative practice part of legislation, what a waste of time. Allow the registrar to continue as he is.

With suitable appeal procedure

if an adi has committed a serious crime etc they should face the consequences of their actions and not just be able to resign

If you're not teaching anymore it doesn't matter if you're on the register or not. Does it matter if we request or not we will just stop teaching!!!

are some ADI's fit to carry on with proper instruction ?

they should be removed at anyone request

Open to abuse

A personal choice.

No downside

If the ADI asks for it then why not? But they should not be allowed back on without the normal qualification process.

But fail to see its significance! If you as an ADI want to come off the register then it's up to you, isn't it?

On request you should be able to remove them providing it's for a legitimate reason, but also the registrar should be able to remove an ADI for inappropriate behaviour or unprofessional conduct.

Removal must be fair and transparent

If they want to go, then that is their choice

If an ADI wishes to return their certificate and leave the register than I see no reason why the Registrar should not grant their wish.

Makes sense

Who is "thier" ? Are you referring to the registrar or the Adi?

As long as there is good justification to be removed from the Register and every avenue has been investigated and checked before doing so.

Not without strong evidence and a rigid appeals process in place

What is the point of adding another process and its associated paperwork, cost, etc when the ADI can simply wait for his/her registration period to end.

Of course.

Depends on the reason.

Only if a valid case of misconduct has been proven. With a creditable appeals process.

if i wanted to cease i just would.

I do think that should an ADI ask to be removed from the register a part refund of the fees should be offered

Up to the individual

Should make sure that the adi has a chance to answer any charges against them

If they dont want to be on the register anymore theres no point in being on/

If someone needs to de-register, should be allowed to. We are in a democratic country.

So long as all reasonable steps have been taken to ensure it is from the ADI in person.

If an ADI is on the register but not teaching, who cares? He cannot get into any sort of trouble, so why go through the expense and effort?

especially when the registrar receives a written request to be removed. Also depending on circumstances, the ADI should be entitled to any refund of registration fee, taking into account administration costs

consultation with adi first

It would make management of the Register easier. Why keep someone on the Register if they are not working as an ADI and want to be removed.

Any ADI should have the freedom to remove their registration

It would appear that the Registrar is already doing this, albeit on a relatively informal basis. Is there really any need for changes to the current system?

Big brother

not sure why an adi would want to be removed from register it is difficult enough to get entered onto it !!!!

Only for gross misconduct

This would only be done if there was a good reason. As long as the person was given time to rectify any training issues they require.

If an ADI wants to leave the register then they should be allowed to do so

He might be in a different profession or business so he or she cannot maintain his ADI standard.

Can't understand this policy - will go with MSA

Depending upon the seriousness. Of the situation

It's the ADIs decision

if it is not broken don't fix it.

I could give you countless examples (on request) of inappropriate behaviour from Instructors, examples that were given to me on more than one occasion. People like this, shouldn't be kept on the register, no questions:

Taking money for lessons and not giving them what was paid for. Inappropriate touching. Locking Pupils in cars, throwing Pupils out of cars and abandoning them. The list is endless.

This appears to be a sensible proposal which will help to ensure the ADI list is up to date at all times

At whose request? If its the ADI then allow them to de-register more easily and conveniently. Its there business decision.

If they are asking to be removed because they have been unfairly treated by a franchise and want to avoid paying extensive costs this is not acceptable. However if it is for a valid reason such as health or not enjoying the job, then this is valid.

seems logical

Let them go

I perhaps misunderstand! Does this refer to the ADI requesting removal or the Registrar!!

I am not sure 'why' the need to remove them would be necessary if there would be no refund available/ unless going into other employment could be hampered by being on the register?

Don't understand the question.

Needs to give a chance to improve and further check test can be carried out, unless there is a permanent medical issue then can be removed.

Common sense.

This option seems sensible and practical for individuals wishing to remove themselves from the Register for a variety of reasons.

would depend on the circumstances.

In the correct circumstance

This seems a reasonable proposal especially since the Registrar currently acts on such requests even though there is no specific legal base for doing so.

this is plain common sense!

This should give the register a more accurate number of active ADI's.

At whose request?

They are not competent to do so

Way too much power!

as there request what would be wrong?

Any removal from the register for lack of standards should be as it is now, that is by the examiners use of testing, if it is for any other issue, EG misconduct then whoever does it now.

Who is the JUDGE ?

IF its a serious crime they commit ,then I have NO problem with it BUT there must be an appeal system

NEED TO KNOW MORE

Does the Registrar have the same say if the qualification goes vocational

Proper appeal procedure install

if there is a valid reason.

If a ADI decides that they no longer wish to instruct I thought that they could ask to be removed from the register so that would mean no change just another cost.

Would assume there would be an ombudsman involved in this process.

I'm not sure how this would help the driver training industry.

ADI's should respect their qualification and all that goes with it. If naughty, get punished! Simple. It would have to be something fairly severe to be removed, so the ADI obviously deserves/knows what's coming! (I sound mean!!!)

The proposals are not clear enough to determine all reasons for removal

Makes sense.

If an ADI wants off the register then yes

Why should a person remain on the register if they are no longer involved with driver training & they wish to remove their name.

As it is the ADI's choice then the registrar should do what is requested by the ADI

This should be a process involving a number of people, not just the Registrar, in order to be a transparent and fair process.

ADI must be allowed to appeal the decision of the Registrar

People who wish to be removed from the register can do so already. Not sure this needs a legislative change.

Why not?

I see this proposal pointless

Don't really understand this question...at who's request?

I can't see why this matter would matter.

Is this not the case at the moment

Again makes sense.

This should be the ADI's choice.

if they want to come off then they should be allowed to as their heart will not be in the job

If you mean at the ADI's request, I agree.

Why not? If they no longer want to do it let them go.

Very dangerous and each case should be judged on its merits. A full disciplinary process should be followed before removal of an ADI.

ADIs should be allowed to request their own removal from the register.

This seems reasonable.

This right should only be used when specifically requested by an ADI

If you want to leave then let them, not your problem anymore then is it?

If the DSA have sufficient evidence to back up the reason for removal, ADIs know the rules, and should adhere to same denying the need for removal, or accept the fair consequence.

An appeal procedure should be reasonably available in challenging circumstances.

We support this measure.

All an ADI has to do to come off the register is wait till their renewal comes up and not renew so there is no need for this legislation

Not really very important. If an ADI wishes to cease, he can just stop, whether DSA keep him on the register or not.

Again a good idea, as above with the proviso that should they change their mind within the next 4 year period they will be allowed back on to the register after passing a standards check.

☐ After the 4 year period they will have to re-qualify.

If I no longer wish to be a registered ADI then that should be my choice not yours

If someone wants to be removed from the register I would have no problem with them being removed - so long as stringent tests are carried out to ensure that nobody else can request another ADI to be removed

at whos request?

If ADI has bad conduct issues

You could be taking a persons way of making a living away from them.

You do not fully explain this so, how can I fully agree or disagree. ☐ It seems perverse that you need legislation to allow the Registrar to remove someone who wants to be removed !!! ☐ Again I think it is what is not said that worries me...

What is the problem preventing this happening at the moment.

If someone wants to leave the profession then they should be allowed to be removed at their request. We also believe they should have some refund of their fees proportionate to the number of complete years left to run less a fixed sum for any costs incurred by DSA, i.e. SC or CRB checks. ADIs paying 4 years in advance for a licence is an anomaly only in the driver training

In order to maintain high standards this would seem to be a logical addition.

Seems perfectly reasonable.

Sounds like a reasonable proposal.

If I want to leave the register then I should be able to.

Only at adi's request by by phone and letter

If someone wants to leave the profession then they should be allowed to be removed at their request. I also believe they should have some refund of their fees proportionate to the number of complete years left to run less a fixed sum for any costs incurred by DSA, i.e. SC or CRB checks

Provided a refund of pre paid fees is included

A list of circumstances should be compiled and published.

If someone wants to leave the profession then they should be allowed to be removed at their request. We also believe they should have some refund of their fees proportionate to the number of complete years left to run less a fixed sum for any costs incurred by DSA, i.e. SC or CRB checks. ADIs paying 4 years in advance for a licence is an anomaly only in the driver training profession. No other profession pays 4 years in advance for their licence to work.

the registrar would need to verify the identity of the person requesting removal

I am not sure that this is really necessary.

It is difficult to understand why this question is being asked. The Registrar is already acting on a request and presumably is not making any refunds of fees. Why is it felt that this needs to be enshrined in legislation? No supporting data as to the number of ADI's who request removal from the register has been provided, although it was felt important to mention an average of 25 ADI's ask to re-qualify each year. Is this perhaps a subtle way to introduce a fee for this process?

yes and give them a refund

If they want to be removed then they should have that option.

BUT - this needs to be done with care as an ADI's name could be removed by accident or as an act of malice from another party - strict checks would need to be in place to prevent a disaster as the ADI would no longer be insured while teaching but may be unaware they have been removed from the register

If for health reasons that will make it impossible to continue as a ADI. People should also be reimbursed part of there fees if they have just renewed their ADI licence.

What is the point of this, if an ADI ceases to practice surely they would just not re-register when due.□Or do you intend that they may be able to claim back the unused portion of their fee?

If good reasons show that an ADI isn't up to standard, then how can they maintain a Qualification that they aren't able to charge for. Protect the public, pupils, the business's of quality adis & the examiners who are sent out on duty with a candidate who hasn't been trained

by a Professional competent instructor.

Yes, if an ADI wishes to leave the register they should be allowed to do so. I also believe any outstanding balance on their "account" should be refunded as it happens in all other walks of life I know. I have no friends or associates who pay for the licence to work 4 years ahead so see no reason for the DSA to hold onto advance right to work licencing fees.

If an ADI wishes to remove themselves from the register, this should be made a simple process.

The Registration is for four years and have paid for that period. If they were to have a 'rebate' and the ADI wishes to be removed I cannot see a problem. However, if after just a year of the four year Registration has been used and they have an employment change and requested removal and subsequently wish to return to being an ADI, they would then have to re qualify. I think it would be in the interests of the ADI to allow the four year qualification to just lapse at the end of the term.

This should be allowed, with a refund of any fees proportionate to the number of years left to run, less a fixed sum for costs incurred by the DSA

Stupid that it's not there already...

I would be concerned that the reasons for removal should be proven valid.

We can see no reason not to do this.

Freedom of choice

I see no issues with this.

There should be a refund for uncompleted years of the 4 year registration fee

If civil/criminal issues are proven.

What's the point!! If an individual doesn't want to do the job he/she won't do it!

If you are saying you, DSA, can remove at will then this is wrong unless the ADI is completely out of his depth

Pointless

We **STRONGLY AGREE** with this proposal.

Yes, we fully endorse the proposal to allow the Registrar to remove an ADI at their own request.

We **agree** with this proposal **PROVIDING** there is a pro rata refund of unexpired registration fees.

Strongly agree. If someone wants to leave the profession then they should be allowed to be removed at their request. We also believe they should have some refund of their fees proportionate to the number of complete years left to run less a fixed sum for any costs incurred by DSA, i.e. SC or CRB checks. ADIs paying 4 years in advance for a licence is an anomaly only in the driver training profession. **No** other profession pays 4 years in advance for their licence to work.

Yes

Feedback on question 23

Is there anything you particularly liked or disliked about the format of the Consultation Paper?

There should be a proposal to limit the number ADI registrations in any one area

The main aim always should be for road safety for all road uses as with last changes (instructor in back / independent driving) it does nothing. More enforcement on new drivers like a data base for police of car and young driver so they can be watched and maybe satnav black boxes in new driver cars to monitor driving behaviour. I could go on but I have given up on this job after 31 years and looking elsewhere for work because I am not a yes man and will become the robot instructor the check test seems to be trying to make us be.

Would be a lot better if it wasn't driven by self interest of the big companies

Detailed but I am a little concerned it's going to miss the mark !

The proposal that you wouldn't need to re-qualify after a year of not renewing but a check test instead is great going forward.

The enhanced standards check: 29. I do think there should still be an option for role play. I have in the past been let down at the last minute by a client and as a result have had to do role play. Whilst I see there have been criticisms about unrealistic role play from others, from my own experience of using role play during a check test I have felt that my SE's have been very good and realistic and I have actually enjoyed the experiences.

not enough options, should have neither as an option.

dislike:- how much money you are wasting on this

As with all 'red tape'. Rather long winded and not very concise. ie. Cut to the chase!

The consultation is not far ranging enough in that it does not cover the likes of the LGV or PCV Driving Instruction. The making of the LGV Driving Instructor Voluntary Register Compulsory or establish PCV Driving Instructor Register. Or accredited training centres for both LGV & PCV and the application and deployment of DDE's

Consultation takes place but nobody ever really listens to the man at ground level. Decisions have been made for better or worse..generally change for change sake...who will ever listen to me

Paper is not easy to follow /understand. Adherence to plain English principles would have been helpful.

Like all consultation papers, there are elements which are very good and will greatly improve the industry, however, there other parts that make no sense at all. Unless it's just to save money.

It doesn't go far enough. The whole standards check system is wrong and based on subjective criteria. If you want to know how good an ADI is ask his pupils via consultation or put a camera in the car and observe how they operate over a longer period. I would welcome an in car camera to observe my standard of teaching. The standards check is not fit for purpose and never has been.

Somewhat lengthy.

unclear what actual offences lead to fines

the paper is strongly weighted/biased in favour of changes, whereas to be balanced it should offer the option of the status quo = no change with an equal weighting and emphasis, as people could legitimately support leaving things as they are

Well thought through and well presented. The proposals are evidence based with an emphasis on risk assessment, public safety and consumer choice. Well done.

Trainees should have to be supervised by an ADI in order to give lessons.

Good to be consulted, thank you.

No...however I would like to be involved in the discussion process as would mor ADI's...

I think the DSA are moving in the right direction - Keep it simple

Because of the size of the problem,the size of the□paper was a lot to ingest.

Whilst I have taken part I do not believe for one minute that it will make any difference, ADIs

have not been listened to in the past so why should we be listened to now.

It Does not address the real problem of driving standards. Only more visible policing by traffic cars will help the situation which is spiralling out of control in everyday driving.

Parking offences are no longer even looked at outside of Large inner cities. All this makes an ADI's job very frustrating as we are trying to teach the laws and rules of the highway code when we know that it is becoming pointless.

I believe ADI's should be mandated to join an industry body like DIA or ADIJC. Let government have powers to audit the industry bodies and let ADI's get to work for themselves and their clients.

All good, well thought out, and arguments for and against specified.

I liked it very much. Very quickly consulted over some important issues .

The consultation should be made mandatory that ALL ADI's on the register to respond

It's not obvious what's coming next, so where best to comment on some things. "Am I going to be asked about that bit later or not? Should I mention this here?" kind of thing.

I intensely dislike the questioning format in the psychometric way as they are too narrow and in my belief are set up to give you the answers you want rather than the solutions to this country's driving problems. My belief will never change that the only way to improve driving standards is to ensure that post test TRAINING is given on a regular basis. You and therefore the government always bark up the wrong tree but thats ok isn't it??? Politicians are only in power for a short term whilst those of us that care have to constantly pick up the pieces for your faults and have to pay for them which adds insult to injury. Lets have a country wide debate not just 22 questions over a few weeks!!!!

I feel that ADIs bear the full brunt of a really unfair system. Our prices are undercut by any old tom dick or harry that wishes to teach and then we have to pay these charges. we might as well give up our licences and do as these people do its much cheaper. no check tests no qualifications no cpd and more money

I found it quite clear and concise

There is always great emphasis shown towards the responsible ADI. When are we going to wake up to the fact that we are part of a system that allows unqualified people to give driving

instruction. Who is monitoring/assessing this negative element of the driving industry?

The time frame between change over period while an establishment is being accredited to deliver the new qualification could pose a problem.

just like I said there should be a change in the law for those who are disabled and look after a disabled person and I also think if u have been a driver before and u got a drivin ban u should be allowed to get ur liecne back and then just go in for ur driving test in stead of all this theory and hazard perception test only new learner drivers shoud do that and school leaves I look after my wife full time and I really do need my licence and I do need a car to be able to get around as she has lots of hospital appotiments I think people like my self who knw the roads and looks after a disabled person should either automatically get there full driving licence or should be able to just go in for there driving test

this is load toward the industry and political ethos not industry bleating

Not really designed for public consumption. Deliberately confusing and full of gobbledygook.

Not really and some things as a qualified teacher I really like. I am nervous about how it will come about and I am really looking forward to challenging the larger companies to deliver greater training competencies for PDI's and a much stronger less test-pass learning for learners.

A question section might be good, and a area for just general comments... this would enable the ADI's who actually do the job to state clearly their concerns that may not be listed here.

Perhaps just a little 'boxy' at times.

The premise in the opening paragraph contains dubious statistics . This leads one to doubt the veracity of the entire consultation.

I am very dissatisfied that ADI's that have been on the VOLUNTARY ORDIT Register are going to be made to join a larger organisation, also that the organisation that is going to run the new system for the registration of all new ADI's will go to one of the large national driving schools, I feel as a sole trader I will not have the finances to be able to continue, I believe this will loose a lot of very good trainers, which in turn will lower the standard of ADI's, which will increase road traffic accidents. a very DISSATISFIED ordit trainer

Could have provided facility to view the consultation document whilst filling in the response

Until Motorway Tuition PRE-DRIVING TEST is allowed, and all the existing legislation is enforced adequately, the system is so unbalanced that the Paper and Process is akin to Neor fiddling while Rome Burns!

the fact that the DSA, key stakeholders and organisations are involved in putting further restrictions in place on the most vulnerable and seeking a cheaper easier option than looking at the real issue that causes these headaches and that is a huge fall in driving standards from all current uk licence holders. No changes to training etc will have an impact of any real measure.

It was resonably clear to read and understand.

It asks the questions it wants answered as with most of these it is tailored to meet your expectations without getting answers you don't want or have to look into areas which you don't want to. All of this has been my own personal view.

The use of NPV's is familiar to me. I have the benefit of an MBA some 21 years ago. I doubt if many in the industry understand what these are.

No, it was a basic document and was well structured

We are m not convinced the DSA has come to its conclusions with a clear vision of what is required to train ADI's to deliver 'client centred learning. We have been significantly raising the standards to teaching for ten years and yet the industry is only now trying to catch up. Whilst we have impressed a few in the DSA, most have, or will retire shortly. Too many people in the DSA and the industry base their opinions of what should be done on their own experiences. The initial reaction to what we do and say is often 'that's wrong' to be followed shortly after by 'that's different', We have been delivering training to learners to the 'new' standard for ten years and it takes a lot more than is being proposed. I just hope they will finally listen

Too long☐Too complex to track how to give the feedback amongst all the words on the emails

There isnt long enough to fully read and understand the consultation it feels rushed.

I thought it was clear and concise.

Confusing as to what changes and why. The real reason

Disliked the time it took to arrive

Easy way to fix the standard of tuition is to reduce the number of minor faults to 6 any more then its a fail. That way instructors will be forced to train to a much higher standard. If they cannot achieve this they will need to retrain themselves.

I think that more should have been put in - for us who are self employed ODRIT accredited trainers , sole traders, because if item 1 of the proposal is passed- I feel I could go out of business. I am currently studying the TAQA Assessor programme in case the proposal is passed- but I am very worried that even with this additional qualification I may still not get any work as an individual - and the bigger companies take over. A very worrying time for me at the moment. (I think proposals 2 and 3 are better options)

seemed very formal

reinventing the wheel again!

In the survey there should be an option "Neither agree or disagree"

It gives very little information on how trainers who only work post test will be graded, assessed or otherwise regulated.

If you actually bother to read what i have put then this will answer this question

It was helpfully clear with a good amount of detail to understand the options

I accept changes have to be made but only for the better of all in the industry and not just for the sake of change.□What I do like is that myself and other fellow ADI's are being allowed to input our opinions on the paper and I thank you very much for that.

All of this points to the ADI being supposedly better□yet any person can teach someone to drive which is a total contradiction.

I have been doing this job for 13 years and the old system has been ok for all this time so why change it.

I don't think the ADI grade should be made public.

I disliked the fact it did not consult on a key element, namely removal of the role play option on check/standards tests. Nor did it allow for suggestions on how the check/standards test can be

improved.

The survey was easy to comprehend and good that it could be done online. I also appreciate the provision of comment boxes. I wish the DSA every success in what appears to be a radical development in driver training.

No - it was pretty clear.

I work for Gloucestershire Fire & Rescue Service and have no intention of instructing learner drivers. But I do instruct advanced & emergency response driving. I still have to maintain my ADI registration as such. I need to be able to be assessed in my role instructing advanced or response driving in excess of the legal speed limit if necessary as otherwise it is not representative of my role and is therefore unfair being assessed in something I have no current experience of. Is there an exemption needed here as the Police currently have?

It reads like a legal document... designed to be confusing! Not very easy to understand.

Its all a load of rubbish you do not care about trainers. Your questions are very inflexible answer wise and its all down to money thankyou the Double Standards Agency.

No, we have to accept and comply with changes and if that improves standards I am all for that.

It was too lengthy and cumbersome.

Disliked the grading format, it should be a pass or fail the same as our pupils.

My Personal opinion that it would eventually go to one of the larger Driving Schools

I find this, like so many civil service plans as change for changes sake and will not solve the problem of road safety or deaths among young drivers. They pass their test so the problems occur after.

I found some questions complicated eg question 21 as I can't remember the details of annex b to comment properly.

Very long and quite hard to digest and keep up with annexes etc

I like the idea of being able to book my own standards test. ☐ I'm strongly against any information being published about an ADI that could effect their business.

I couldn't find how some the benefits statements in option 1 were arrived at. I would like to know what the basis for the evidence mentioned is.

No, but please do something to improve the current system, man up, b brave

Some of the questions I didnt understand or there should be an option of I dont know. Thats why I left some blank

Like the fact we have been able to give our feedback. Would like to see more 'education' for personal development without expensive fees

I think the sum of £1500 for tuition is vastly exaggerated

The options given are too cut and dried with very little flexibility. □As a working ADI I would expect my response to be given more weight not simply to be marked as 'Member of the public'. I find that description demeaning after 12 years as an ADI simply because I choose not to join an industry association as most ADI's also choose not to do. □The large ADI organisations and driving schools do not totally represent all ADI's and they should not be given undue weight on consideration of the overall response to this consultation. The large driving schools only represent a tiny minority of the 45,000 Instructors on the register and the industry bodies consulted have little participation from their membership apart from a small number of vociferous active members. Their input should be downgraded appropriately. □Readability is poor with the annexed sections not available in the main text as a summary. □More information should also be given about the information that the DSA wishes to provide about ADI's. □All in all, poorly done and transparently a way of pushing through a cost cutting agenda.

Do not change for the sake of change but for the benifit and safety of members of the public and pupils also examiners Thank You

too long and at times difficult to understand I was under the impression that the Government and its departments and agencies were subject to an agreement on plain English.

There can be nothing wrong with trying to raise the standards of ADI's and therefore the standards of road safety in the UK. □Currently too many ADI's are struggling to make a living, many of these are good quality ADI's. □Hopefully the quality of instruction and driving lessons will improve and so will the fees paid for them.

Easy to understand.

All seems slightly pointless. You should concern yourselves with delivering tests in suitable

premises with suitable examiners. We all want to see fewer youngsters killed on the roads but no amount of tinkering with ADI'S will effect this. Some young people will always be irresponsible

Plain english, not legal, marketing speak would be nice.

The financial figure have been most confusing.

I disliked the fact that a real learner is needed for the part 3. Someone who trains ADI's would be penalised for not teaching learners.

I think it has been a completely unnecessary paper as I am of the opinion that the emphasis and finance would have been better spent in finding ways of encouraging and/or disciplining drivers to adhere to existing Laws. You could have the best instructor in the country teach someone but if that person then chooses to drive in an unsafe manner there is nothing you can do as an instructor.

No, But what I would like to see is a set price around the country for tuition this would help those in the industry be proactive in their work and that silly prices set by those wishing to do the job for PIN money would make it a more proffessional job.

Just don't see why change what isn't broken!!

I found it very rambling and confusing in parts, and not easy to navigate. Having said that, this was probably in part due to the fact that I was reading it on my PC and not from a hard copy which would have been preferable.

I actually think that the Training Licence should be abolished and only fully qualified Instructors should be allowed to teach for reward. This not only protects the industry but protects the public as well from possible substandard teaching

Thank you for the chance to submit some opinions

Role play should be kept as part of check test. I run a part time driving school. I only have pupils who can do evenings or weekends, will i be able to do my check test in the evening or weekends at no extra cost? I feel I'm personal being peniliased due to this.

I don't know how to answer question 21. Annex B talks about 'the principles of the Compact'. It does not make any sense to me.

The consultation misses the main problem□The DSA is looking in the wrong area to improve

road safety, the major priority is to reduce post test fatalities of our young people. compulsory post test training and retesting would achieve better driving standards, not tinkering elsewhere

nothing in particular

Previous experience shows far too much consultation and then either no action by DSA or they don't listen to the ADI. CPD and the new motorbike testing are just two!!!! After all the fuss CPD never happened and the off road motorbike test has been reviewed and is still causing problems even though trainers saw it coming!!!!!!

It's a joke the old saying rip off Brit no wonder Scotland will leave uk there are rules and most people abide by these but your making people see money making rules for taxing them for living in uk

It could have been simpler and easier to read.

stop meddling

I wanted to comment on bad driving and ask what instructors are doing to ensure they provide the best advice but discovered there is no option here to do this after being guided here by DSA staff.

Only that the DSA appears to have already made its mind up.....

Clearly explained and laid out.

Too institutionalism in its modus of thinking-through a real world requirement. I sometimes wonder if the DSA shouldn't get more involved at grass-roots level on a regular basis.

i like the idea of changing the qualifying prcess and altering the check test to the new standards check. amending the cost of paying one lump payment for licence and to be able to book own standards check to a time suitable to me and pupil

I agree their needs to be change,but please do make sure a full and balanced cosultation takes place with the professional organisations ie MSA.

IT DOESNT SET OUT THE RULES FOR PEOPLE LIKE ME WHO ARE DSA LGV /PCV INSTRUCTORS

The qualifying process sounds much better as long as the vocational course is robust and covers everything required of a modern ADI

Ask ADI's what would be the best ways to improve the industry because these questions are very limited thus not providing the answers to how improve the level of instruction given to PDI'S/ Pupils.

Very clear and very well written and in enough depth to be able to answer the questions in this questionnaire.

seems simple enough

it all seems a bit of a joke really not tackling the real issues instructors are really struggling these days ☐pass in a week☐10 lessons £99 Jesus thanks dsa

Total waste of public money.

I cant help thinking a lot of what you are proposing is change for changes sake. for instance how many times in my 7 years as an adi have you changed your website? Must have cost a fortune each time I say no more

You want to change the system which could be good but do not want to help us. All these extra qualifications cost money but i can not put up my prices as every one around me charges £2 ph less so customers go there. You get lots of extra money we get less, & your not bothered.

Apart from in being lengthy... it was set out clearly. However during this survey when it referred to the paragraph number I could not see that while I was looking at the consultation paper in another window?? Eg, it said 'refer to paragraph 60' and I had no point of reference and had to scroll through myself to the relevant part to help me with my answers.

The consultation period is too short.

There is no mention of a 10 year or less assessment programme for all drivers. If this were imposed by government road safety would be improved. When a pupil passes their practical driving test they are at a high standard. They need to keep that standard of road safety throughout their driving career. If they knew they were going to be assessed each time the photo card was due for renewal they would try harder to keep up their driving standard.

Too many items are untraceable in the document. There is probably a link somewhere, but we are being consulted with holes in the knowledge available. This makes it very time consuming

and impossible to make a full analysis.

An overview of questions would be useful beforehand since being short of time it would be easier to plan answers more effectively

Since the consultation will primarily impact on ADIs it is important that this audience is engaged as part of the process. We understand that the consultation has been widely promoted via relevant publications which ADIs may receive or can subscribe to. ☐AND☐A “Don’t Know” or “Ambivalent” box would have been useful as for some questions we did not have enough information available to us to agree or disagree.

easy to read

I don't feel the standards test is ever going to pick out the bad instructors. They know how to behave when they are being checked. When they are on their own with the pupil it is a different matter. I have several pupils one to me from other ADIs who have treated them terribly. These are the people that need to be found and stopped.

a shake up of the industry and the involvement of the PDI's is long overdue so now i can see the industry pulling itself away from a stale and dusty situation and now putting all of us into a more professional stature and thus gaining more respect from an unforgiving public. Perhaps now this consultation has gained ground and can push forward we can then look at modernising an outdated driving test and then to raise the general standards of all licence holders and bring our casualty statistics down once and for all

The format is 'closed' seeking to reinforce conclusions already decided upon.

Timescale. Too short for completion as associations meet once a month and may have agendas in place. Could have done with about 6 months to the deadline.

This will only be answerable after the consultation period and the results published. If action is taken in line with the findings then the consultation will have been worthwhile.

Under the preferred option 1 there is no back up plan if the legislation fails to get through parliament before the next election.

There is no consideration of post test restrictions/further training. I feel this is the area that would benefit younger drivers most.

Will changes to help the ADI be made or will changes be made to hinder the ADI? Time will tell.

ADI check test, if pupils do not want a lesson as a check test what is the fall back position?

Pupils must have a right to privacy, also affected on examiner check test as some pupils do not want the other person there.

It normal feels like consultation paper are just a tick off process and that you already know what you're going to do so these consultation are a waste of time

The inability to send in a proper reponse, as tick box responses tend to narrow options to comment, □The Motor Cycle Industry Association (MCI) is the UK trade association for the supply side of the motorcycle industry. It represents over 90% of the motorcycle industry and includes membership from manufacturers and importers of machines and associated products - plus the suppliers of goods and services across the industry. □MCI's sister association MCITA is a key representative body for UK motorcycle trainers. The MCITA draws its membership from across the training industry, with a properly established membership structure that allows for fair consultation and representation of trainer views. □Although the DSA consultation is in relation to ADIs, the proposals put forward in the area of vocational instructor training are almost fully in line with the MCI's policy on motorcycle trainer development. Indeed, until around 18 months ago, the DSA and the industry were working together on developing such a vocational qualification route. Unfortunately, this work was deferred due to the now completed motorcycle test review. □MCI very strongly feels that this work should now restart, in order to pursue this more progressive route for motorcycle trainer learning and also to avoid a huge inconsistency from emerging between the qualification routes for car and motorcycle trainers. This is something that industry feels would represent highly inefficient governance of overall trainer/instructor qualification. □MCI comments in a positive way on the proposals for ADIs, though in doing so illustrates why it is important that this route is also applied to motorcycle trainer qualification

The consultation paper talks about new PDI's and training and the new Standard Test but is does nothing in the way of covering those of us who are already ADI's and continue to look and improve our skills. CPD should be brought back and made mandatory for all ADI's. If you look at any other business training and CPD is a must to improve skills. If you want to improve the way things are done CPD must be put back on the agenda and ALL ADI's must sign up for it. It can be included as part of the Standard Check.

We feel a combination of options 1 and 2 would actually be the best way forward for ADI training.

in truth it does appear that option 1 is a foregone conclusion but it is nice to at least have a say in the industry i am proud to be a member of

ADI's booking their own Standard Check Test when it is convenient for them - not DSA

Long winded.

Sometimes you get for a check test an Examiner who in the past you MAY have had a problem with, IN THESE cases I believe that IF an INSTRUCTOR HAS HAD a PROBLEM with a certain Examiner he should be ABLE to state that HE/SHE does not wish that Examiner to conduct their check test

NEED TO KNOW MORE ABOUT PROPOSED CHANGES AND WHAT IF ANY BENEFITS THE CHANGES COULD HAVE TO MAKING ARE ROADS SAFER?

I would have liked an opportunity to comment on Driving Instruction in a broader sense and to have included the Voluntary Register of LGV Instructors within the proposed framework. I would also suggest the development of a similar ADI qualification for PCV instructors.

Understandably very complex thus have only found time sufficient to skim read.

seems rather long.

Easy to understand, but a bit abrupt with some of the answers

I like the that for change you are asking the ADI's for their opinions and not just big organisation.

I feel that the timescales under which the consultation process has been carried out has impaired the ability of people to consider and influence for the better the eventual outcome.

It may be seen as a fait accompli by cynical members of the public.

Not long enough

The ADI is being told...not consulted for an opinion which will make any difference or be listened to

The focus seems to be on new drivers and not existing drivers. What are the plans for existing drivers who cause accidents. New plans to stop mobile phone use for example and speeding have little impact so more points need to be given which will focus their minds on driving well and will mean more test to be taken for existing drivers who 'show no regard for driving safety'.

These poor drivers should then receive formal training and be subjected to 'client centred learning' and a new test.

How about a no comment button.

I dislike the implication that we have choices in what seems to be rushed and ambiguous in areas. In turn, these questions are too open to wrong interpretation, no doubt the civil servant/statitition who is not an ADI and therefore (no disrespect) has the driving opinions of an average driver will no doubt and absolutely not get it right.

It's great to look at the industry and review

Dislike the system as it is, don't see anything improving it in the paper, the work of Driving instructor will not be able to just keep absorbing more costs and penalties, with the very real threat of the sack based on a 40 or 50 minute assessment on a check test: all this after the costs of training will put many people of trying to qualify Use the results of tests for an accurate and true picture of the skill of the Instructors.

Consultation period to short. More time should be given to allow to read all paperwork

there has been no proper consultantion and the time frame is being rushed through

No - best attempt yet

What is the point off all these changes because you haven't covered the big one ! Parents being allowed or other drivers with a full licence allowed to give lessons long as they don't except money an who checks these to see if they are teaching correctly? Until you stop any Tom,Dick or Harry teaching,the roads will never be any safer. So why don't you if you want to let Tom Dick or Harry give lessons to to there sons or daughters why not make them have X amount of lessons first with a driving school and have a certificate off a driving school to say have reached a good enough standard to take extra lesson without a dual controlled car .

haven't had time to read it a brief explainlnation would of helped here

straight forward easy to understand question answer format.

Not really clear on what is required on the new test

I think it might give DSA what are the views of each individuals but it's point less if nothing is

done about it

The plans don't take an overview of the industry properly. The idea that too many PDIs don't succeed is a smoke screen that hides the fact that there are too many ADIs on the Register. I am leaving the industry due to this. The DSA has resulted in this becoming a part time occupation with part time standards. The training industry are the real winners over the near 20 years I have been an instructor.

Registration Fee too high? Changes to the Check Test long over due, regards Darren Tongue.

The proposed benefits of some of the changes are merely possible not a guarantee !

As usual with all Government proposals it is too long winded

Many 'groups' have not been reached that will be affected by this policy. You have been asked to extend the time by the larger associations but this has been refused. Why?

It's too much information to read & take in & I'm sure many ADIs will give up before 'having their say'.

The consultation principles are very vague and ill defined.

It is claimed that ORDIT registered trainers have been consulted already but I am an ORDIT registered trainer and have heard little. Please note that the large training organisations represent themselves, not the self employed ADIs or trainers that have a franchise with them.

No, it was much appreciated to be asked rather than told. It will however, only mean something if the results steer the course of any proposals.

Fair coverage.

As with all things like this, it is merely tinkering. □ I would have been impressed if the DSA had announced that the way training was to be delivered in the future was changing to encompass the national standards and in order to stay on the ADI register instructors would have to re qualify at the new standard before their current licence expired.

The training and standards check for ADI's needs to be modernised to fit with the more modern ways of teaching (coaching). The new format set out in paper seem to take this into account which will be an improvement to current system.

If its a consultation then lets consult properly. Do not push things through without thorough and frank discussions as will happen in this case in my opinion

As an ADI and an ORDIT Trainer . It would have made more sense to ask us for our views BEFORE any consultation . The present ADI qualification process is outdated and the present L test is outdated

I like the fact that we can add additional comments.

There seems to be no provision for registered ADI's who only do fleet assessing, as in my case. I have never had a pupil to teach as I qualified and then did my fleet assessor and have been fleet assessing ever since. This proposal indicates that I will have to learn a lesson, find a 'pupil' and go through a check test that I've never done (both my check tests were fleet). Bob

No - it was clearly written.

Too long winded and very late on arrival to my email 2/8/13 for my response

- 1 Insufficient time to assimilate information and provide informed responses.
 - 2 The large volume of documentation to be read.
 - 3 The opportunity for as many stakeholders as possible to reply and contribute to the key proposals.
 - 4 Many aspects of the documentation are confusing, unclear and ambiguous, requiring further clarification.
 - 5 The proposals suggest the most significant changes to the driver training industry for decades, and therefore more time is needed to make sure any changes are for the better and there is a significant improvement in the Driver Training Industry.
-

There are too many people outside of the industry being allowed to make comments about things they don't know about.

We feel more thought needs to be given in relation to:

- The potential impact the proposals would have on costs to those learning to drive
- The impact on those who currently train driving instructors

just a general type of paper

Would have liked more questions about the changes instructors would really like. □ NOW, THAT WOULD BE A CHANGE.

There needed to be greater description about the type of ADI information that is being thought of for public dissemination.

I am not so sure or happy about any proposed changes to the check test or grading for adi's. I think the current system in place is perfectly adequate, and put the emphasis on road safety which is the most important factor when teaching drivers.

The short timescale for response and that the local and national associations have not been consulted are both, in my opinion, wrong.

I liked the opportunity to be able to make comments. However I feel you have missed a golden opportunity to make a real difference to the way young people drive when they first pass their driving test. A very small percentage are really interested in any further training after they pass, which can be born out by the low take up of the Pass Plus scheme.

Insufficient time for such major changes

All good and clear and well structured and put together and seems to actually be going in the right direction towards improvements that are required and long awaited which much is shown in the consultation principals

I feel these consultations are little more than 'tick in the procedures box' and that the wrong people are being asked about driver training.

You talk to the likes of the AA and BSM when they existed but training companies are all about getting ADI's working for them so making money, they don't actually train drivers they just look at the profit and loss accounts

Disliked the phrasing of the questions. They required a lot of prior knowledge and in lots of cases were ambiguous. le q21.

I think it should be discussed longer before a decision is made, there are some very good proposals, it should not be rushed into though

The whole paper is biased towards a single preferred option, and the questions are worded to reflect this. There are many ambiguities and some proposals for change which are not fully explained, despite the raft of documentation to support the consultation. The allowed timescale to respond is wholly insufficient to allow a full review and assessment of the contents and to clarify the ambiguities and implications within the documentation.

It made sense except the costings which to be fair went over my head.

ADI's to book check test□carrying out CRB's check every 4 years - why?□If ADI has bad conduct or driving issues such as 6 points in 4 years - then CRB.□I feel this an unnecessary task which is expensive - ADI Renewal License could be £200 every 4 years.

I think the consultation is slightly after the event. You have already decided to change the check test which comes into force in APRIL 2014 so we have not been consulted about this. The role play option should remain. No ADI can guarantee a pupil will turn up for the standards check. You are forcing the ADI into a situation where if they fail to produce a pupil on more than one occasion their licence can be revoked. This is not only insulting to us but totally beyond our control.

I do not think that other European nationals should be able to come and teach in the uk without passing the uk qualifying tests and standards/check test

Change for the sake of change is unnecessary. On road Police checks for bad driving even including poor driving instruction might be a better use of this consultation.

I have several issues with this consultation and the way in which issues like this are explored and resolved.□ADI's are mainly self-employed individuals and whilst we may join an 'association' such as the DIA, membership is not mandatory.

This smacks a little of raking over the coals for the sake of it, or to box tick some high ranking civil servants performance agreement development section.□Instead of analysing ADI's to death, why dont you do the real thing that will improve driving standards in the uk: Bring in a 5 year re-test for all current licence holders to make sure they are still safe to drive at an acceptable standard. (p.s most of them are not..as I have to watch them everyday....!)□Paul

The problems with the industry are not being addressed here and the DSA is just simply 'passing the buck'. Both pupils and instructors would benefit with extra tuition within a year or so after qualification.□You are about to break something in order to try and fix it.

no comments or detail about instructors who remain on the register but do not work as an ADI

or have a driving school.

would prefer shorter chunks of consultation followed by separate responses to each proposal

Where is the question asking me if there is anything I liked or disliked about the questions being asked by you? I think that allowing a PDI to go through 2 years of training without a DBS done first is appalling. I think you are putting ADI and trainer's safety at risk and this needs to be the first thing that is done when a PDI registers to do the course!

More tinkering about the edges whilst ignoring the realities of driver training and road safety. For instance, lack of motorway tuition, post test training or regular driver assessments.

no, things have to change with the times and these proposals look fair

Consultation not long enough ☐ Not enough positive information

Insufficient time for the ordinary ADI; many of the questions are ambiguous and can be recorded positively irrespective of how they are answered. ☐ The proposals are poorly thought out - poorly laid out - there is a lack of information - leaving more questions than answers - there was insufficient time to consider in any depth and to provide accurate / detailed responses to be made. A total lack of consideration has been shown to this profession which highlights the arrogance of this government agency. I'm sure I am not alone in the way I feel about this consultation.

set out properly

Not enough option to state concerns outside of these questions like an 'any other comments' box.

The chance to reform current systems and provide higher quality services to the learner driver, including the confidence that the system is current, well regulated and that Instructors are of the best calibre possible. This would move us into the arena of innovators and field leaders.

Ref Q21 above:- Even though the MDT project has been discussed at high levels not all the same players have been involved and there are far too many who choose not to be represented nationally and who also need to be advised. The standard 12 weeks should have been considered in this instance to allow greater detailed investigation.

Ref Q22:- Insufficient time for the ordinary ADI; many of the questions are ambiguous and can be recorded positively irrespective of how they are answered. □The proposals are poorly thought out - poorly laid out - there is a lack of information - leaving more questions than answers - there was insufficient time to consider in any depth and to provide accurate / detailed responses to be made. A total lack of consideration has been shown to this profession which highlights the arrogance of this government agency.□The ability to return to page one to recheck the responses is very poor and is unworkable. A Goto Page menu should have been included.□There seems to be no facility to print off a copy of our response for the purpose of keeping records. unless this is included on the next page

Re. question 21

the principle:□•departments will follow a range of timescales rather than defaulting to a 12-week period.

This has been used to reduce the consultation period, despite all of the national ADI associations requesting more time to enable them to consult with their members.

It does match the principles but of particular concern is the lack of time that has been given to complete such an important process in just 6 weeks.

The time allowed was insufficient to digest all the information because the results of this will have a profound affect on my industry. Every driving instructor registered with the DSA should have been send a copy of this consultation by post so that as many of us could have responded as possible. In section 5 the question asked should have been phrased - are you responding on behalf of an organisation, a driving instructor, or a member of the general public? The fact that the main people this consultation will affect was not even mentioned says it all about this consultation.

The format is fine.

For a consultation paper it is covering some very important points. What feed back can we the industry expect before any decisions are finally made.

A simplified version would have very acceptable.□The rationale of current practices. It would have been better to separate from your explanatory notes.

None of the proposals will make a jot of difference 2 road safety !! Improving the adi s working standards will as happier adi s will make better teachers and there is very few happy adi s that i know !!

unfortunately I would have liked more time to read deeper into this as when doing a full time job not always the time to do the reading especially as I only found out about this paper not long ago and hence at 11.30pm reply

It was too long and complicated. Not written for the general ADI!

The time scale for consultation is too short to allow the average ADI time to research and challenge the evidence and references DSA use. ADIs who do not represent an organisation are treated as members of the public

It was very thorough. That said, we intend to write to the DSA in the next few days with a more personal response.

The consultation document comprises 21 printed A4 pages; however much of the content are assumptions and conclusions based upon referenced data. To follow these references, and further references made within those references, brings the complete documentation to over 1000 printed A4 pages. Given the short period of time allowed for responses, and the amount of questionable supportive material within the references it is reasonable to suggest that the consultation process is biased towards a predetermined outcome.

Someone wants to prove their job they have is a worth while one . And it can make money , Oh is that for a non profit making dept .

to what end?

Seems biased towards getting the result of option 1. Get the strong feeling that this consultation is pointless because things are already decided. Or maybe I'm cynical

I feel we should be looking at making it compulsory for learners to have X amount of hours with an ADI, ALL driving tests to be conducted in an ADI's car. Limiting engine size of newly passed drivers etc etc instead of faffing about with ADIs(at the moment) We arent the ones killing ourselves or others on the road!!!!!!!!!!!!!!!!!!!!

Yes - the proposal to change the qualifying process. There are many ADI's who are ORDIT registered like myself and I do a good job, sit in on all part 2 and 3 exams and keep up to date with the training and examination process. My pass rate is 85% on the part 3 and 99% on part 2 - you would be losing some excellent trainers as we cannot afford to retrain and offer the NVQ based training. I have a full teacher training qualification and have spent years and money retraining. If you change the qualifying process we will simply not be able to compete with the large organisations and the mass marketing campaigns and many excellent trainers will be lost - you will also lose some excellent examiners (SE's) as the tests will no longer be conducted and

of course the examination fees collected.

This consultation paper should have been given a longer period for different driving instructors association to discuss. The time limit has been a disadvantage since many instructors were NOT aware of this.

Yes Disliked

Not enough time to research all the questions

The consultation period was too short for the trade organisations to take a comprehensive survey of their member's views.

The questions should have links to to the relevant sections to provide an accurate response

Have yet to see anything the DSA or government do that has been of any use to today's driving instructor's and do not see this doing any good. as you are aiming at the wrong people yet again. You should be trying to re-educate the ones who wont to learn to drive. As instructor's we can only do so much.

I think it is rather long winded and takes a lot of digesting to deal with effectively

The time to consider the paper was too short.

The DSA/Consultation paper has failed in a duty of care to those who contribute to a large proportion of their income. □ADIs have a need to earn a living and like myself can only repond to this document in their spare time. □Due to necessity, due to the Agency allowing the work place to become flooded wioth ADIs, I do not accept the argument that the register could not be closed as there are many other ways to control the entry levels,many are in additional part time posts trying to support their families.

I found the way that data was presented in the Impact Assessment to be totally incomprehensible and completely useless for making any form of decision.

No, it was appropriate.

Yes. I feel that ADI's have not been communicated with apart from this questionnaire and I suspect these proposals have been made by someone not in our industry who has no idea how things work. Leave us alone!!!!)

The whole paper is biased towards a single preferred option, and the questions are worded to reflect this. There are many ambiguities and some proposals for change which are not fully explained, despite the raft of documentation to support the consultation. The allowed time scale to respond is wholly insufficient to allow a full review and assessment of the contents and to clarify the ambiguities and implications within the documentation.

Even though the MDT project has been discussed at high levels not all the same players have been involved and there are far too many who choose not to be represented nationally and who also need to be advised. And what happened to the standard 12 weeks period?

Very long winded with a bias against small businesses... like mine.

Typical consultation, biased in favour of option 1. Almost unintelligible in places. Sounds good but means little...

It was not very user friendly - difficult to print off to review & no option to save & go back to later (as you can do with annual HMRC submissions). ☐ No option to print off my answers.....this was particularly disappointing

My view is that a lot of focus is being directed towards learner drivers and newly qualified drivers, and to a degree rightly so. But I think more should be done towards those who have been driving for years, as I feel safer when out with newly qualified drivers than those who passed 10 to 70 years ago! Experienced drivers' attitudes and skills are getting worse but nothing is happening to address this. Perhaps a theory test when renewing their 10 year photocard licence?

Too much to read and taking into consideration in the time scale

I dislike "consultations" as a matter of principle. It is too easy to engineer them to satisfy the criteria of a predetermined outcome. In fairness, however, there is no reference to WMDs

The time period allowed, in particular with some intrusion into the summer "holiday period" of the year is too short.

Need more time to consult

Too complicated.

No option for - neither agree or disagree.

It would be useful to have a link to the relevant section of the proposal with each question.

Good to talk and be open and most importantly ask people in the industry as to the best way forward!

This consultation period was not long enough for enough stakeholders to take part. In addition, the final date for entries has been mysteriously brought forward a month without any explanation. □ In our view this is a breach of the government's guidelines for consultations.

Many of the questions are ambiguous and poorly thought out.

the consultation period was far too short to allow full digestion of the information provided and it was a bit more confusing than it needed to be

Not enough time given to process all of the information provided by DSA. Registrar refused to meet to discuss issues relating to a poorly set out code. Little or no interest given by ADI's.

i dislike that check test charges will be imposed if the dsa decides to do one every month they could do

Consultation is set out to come to the conclusion that the DSA prefer. It is difficult to fill in consultation to adequately express dismay at DSA proposals. Particularly after the mismanagement of the previous regime.

I believe that it is almost all biased strongly towards qualified instructors and fails to address the real needs of PDI's. It is almost like an instructors charter and will encourage an "I'm all right Jack" attitude. It totally fails to address the issue of bad instructors.

There is not enough information to truly comment on this it's not explained enough

More time to analyze the documentation

The consultation period was grossly inadequate. The industry should have been given a full 12 weeks to consult on such important proposals, some of which we believe will negatively affect each and every ADI and road safety as a whole. With this in mind, we also believe that the consultation should have been presented to ADIs in hard copy format (or at least a letter to all ADIs to notify them of the consultation and a link to the digital form). There are many ADIs who still know little or nothing about the consultation, and this is the negative side to a 'digital by default' principle.

The consultation itself is written in a very biased way throughout, and it almost seems as if Option 1 is the ONLY way forward being considered by the DSA. I understand that discussion has been taking place for a number of years on this topic, but these discussions have seemingly taken place with association heads and stakeholder management – with hardly any input from the very ADIs and Trainers that these changes directly affect.

The consultation paper itself is laid out quite well and relatively easy to follow, but the impact assessment is extremely complex and confusing, especially given the short timeframe in which we have to study it and respond.

Well laid out & referenced but extensive to the point of tedious.

The consultation has been rushed through. It is very complex and refers to many other long and complex documents and I believe many will feel so bogged down trying to get through the numerous documents and failed to respond or had insufficient time to read and respond.

Insufficient time to read such an extensive document and lacking in information needed to make a confident decision.

Liked it when you invited ADI s to consultations in varying locations and sought their views at that time and allowed for questions and answers and group discussions

Very laborious finding 'paragraphs' of information, quick links attached to the relevant questions would make the process much easier

Baffled

The proposals suggest the most significant changes to the driver training industry in decades, and necessarily require a considered and informed response. We strongly feel that the duration of the online consultation process should have been extended to allow our members more time to reply and this conflicted with our belief that as many stakeholders as possible should be able to reply. We wrote along with the other national associations to make our concerns clear and to ask for an extension, but this request was declined. We consider that six weeks consultation is insufficient time for busy ADIs to read and fully understand the large volume of accompanying information and documentation. Many of the core aspects of the documentation were confusing, unclear and ambiguous, and thus requiring further clarification. The short duration of the consultation provided insufficient time for the associations to gather, analyse and assimilate information in order to provide a fully informed and balanced response.

Alongside the other national associations, DIA has raised concerns over the communication of

the consultation. Although we have made every effort to communicate with our own members about the progress of the MDT consultation, it appears many ADIs were unaware of the key elements of the consultation, or had very conflicting information about the proposals themselves. Many ADIs were concerned that the consultation time period was too short at six weeks, especially if they were not immediately aware that the consultation period had commenced, as indeed many seemed not to be. Others reported that the questionnaire itself was restrictive and did not give them enough opportunity to give a full response – and we have also had a large number of members commenting the consultation information provided raised so many further questions, they felt it was difficult to give a fully informed response before they had more answers.

One key issue of the consultation which we would highlight - if an ADI's first (and in some respects only) received communications about the proposals come from an influential third party (and not the official source, i.e. DSA), especially one which has a largely negative view, then we can sadly expect that many will respond in the same vein to the consultation. DSA cannot assume that respondents will necessarily go and read all the official information published before making their individual feedback, especially if a third party is already actively and regularly communicating a steady feed of their own views and thoughts on the subject to them (under the guise of providing information to members) and is a 'trusted' source for those ADIs. In the last few months we have seen communications by third parties which focus solely on threats and weaknesses within the MDT proposals, and not potential strengths and opportunities. We then see those views cascaded to other ADIs via social media and other forums for discussion, like the chinese whispers they indeed are, with often staggeringly erroneous and misleading 'information' being circulated as a result. More frequent communication, directly from DSA to individual ADIs, as the consultation progresses will at least give driver trainers an official source of information to compare and contrast with information provided by other organisations who are focused on a communications agenda of their very own.

Along with other ADI associations we have been critical of the decision to have a very short period of consultation. We understand that this was because it was considered unnecessary for there to be a full length period of consultation as the ADI representatives had been closely involved with the MDT agenda from the start. Whilst our involvement with this project has been ongoing for a period approaching ten years the options shown in the consultation paper are not fully the options we had been discussing.

It is only a short time ago that we were being told that DSA officials had cleared this consultation with ministers and those proposals being finalised in preparation for formal consultation included:

- ☐ modern qualification processes and enhancement of the current DSA route and an alternative accredited qualification route – **NOT INCLUDED**
- ☐ that external verifiers would be DSA staff– **NOT INCLUDED**
- ☐ mandatory continuing professional development– **NOT INCLUDED**

In a press statement the minister said "The next step is for DSA to finalise proposals to modernise the qualification, registration and quality assurance arrangements for driver and rider trainers. The aim is to ensure minimum standards of training, mandatory continuing professional

development and improved information for every learner driver”

What this consultation offers is not what we have been mainly involved in discussing. We wanted, as apparently did the minister, a package to assist the whole driver trainer profession.

☐ A dual entry system to the profession in order that new ideas could be tested and a measure of the success of one route against another could be considered. **We are being denied that choice.**

☐ An accredited qualification system backed up by DSA involvement. **We are being denied that backup which would give many in the profession confidence in a new qualification**☐
In the short term concerns about the quality of driver training is not going to be addressed by changes to the entry system we need to tackle the business of improving standards of all ADIs and we were repeatedly promised continuing professional development for all. **We are being denied that which would most assist in upping the standards of the whole profession.**

Other responses

We received 1 separate response in the form of a Word document. This is provided here with the respondents details removed.

Foreword

The opening paragraph of the document¹ contains inaccurate assumptions which render the remainder of the document subject to doubt.

It states that pupils pay an average of £1500 for 50 hours of instruction; at a later point² the document amends the average by including the cost of tests and provisional licence in the quoted total. The cost of the provisional licence is £50.00, the theory test is £31.00 and the practical test is £62.00. This would make the average cost per lesson £27.14.

As many driving schools offer lessons below £10.00³ it would be necessary for other driving schools to charge at least £44.50 in order to obtain the quoted average.

A search of the internet shows that a realistic average charge for a lesson is circa £19.00⁴.

A similar search suggests that the realistic average time for which a pupil takes driving lessons is 35 hours.

The DSA suggest that 99% of new drivers take professional training, which is approximately 742,500 by the DSA assessment.

Accepting this as an accurate figure, the amount spent by learners using more realistic data is £493,762,500 a deficit of £619,987,500 against the DSA estimate of £1,113,750,000. (A shortfall of 55.7%)

¹ <https://www.gov.uk/government/consultations/modernising-driver-training/modernising-driver-training-reform-of-the-regulatory-framework-for-approved-driving-instructors>

² DfT learning to drive consultation paper (2008),
(<http://webarchive.nationalarchives.gov.uk/20080804224502/http://www.dsa.gov.uk/category.asp?cat=545>)

³ <http://www.reddrivingschool.com/learners/?addwords=1&gclid=CIKV3OzJ0LgCFeXMtAodOBkA-Q>

⁴ https://www.facebook.com/groups/icantcoverit/permalink/510576219012198/?comment_id=510784218991398¬if_t=like

The consultation document states that there are 45,000 ADI's on the register, but makes no mention of the PDI's currently giving instruction. Data from the Department for Transport via Statistics @DFT⁵ shows that by the end of March 2012 there were 46,335 ADI's and 6,227 PDI's on the register; a total of 52,526 persons authorised to provide driving lessons in the UK. That number would be higher at the time the consultation paper was published.

The DSA has already confirmed the change to the check test from an evaluation of an ADI's teaching competence to an assessment of compliance to PC standards. Alarming, the DSA has published the score sheet before determining how the targets should be measured or met; the published check test document is failure orientated.

Is this fait accompli the vanguard to push through proposals to change the qualification process for Driving Instructors? The DSA's own statistics demonstrate that the current process is successful and in their own words "Great Britain has some of the safest roads in the world. ADI's have contributed to this." There is concern that many applicants waste time and money attempting to become driving instructors, but the solution is not to make the qualification process easier; DSA data indicates that the industry is already saturated. The answer lies on the other side of the road, by regulating the training companies who exploit naive applicants.

Hidden within the document is the announcement that regardless of the outcome to this consultation document, the DSA will follow an EU directive and allow driving instructors from EU countries to operate in the UK without ever being subjected to a test of their ability or standard.

Background

Qualification

The current qualification process is explained in a clear manner for the most part. It smudges the manner in which the ORDIT register is managed. ADI's are required to show evidence of training persons to be driving instructors and if they are considered to be following the DSA requirements can join the register. However, no training is required prior to the ADI commencing instructor training, and if the ORDIT assessment results in a refusal to be placed on the register the ADI may continue to train. How can this be acceptable?

Similarly a trainee driving instructor may apply for a trainee licence provided they have had 40 hour training with an ADI, however none of this training is with an actual pupil and during the 6 months that the provisional licence is valid there is no requirement for lessons to be supervised.⁶ Should the PDI fail the Part 3 test there is a requirement for a further 20 hours of instruction, but again, no requirement to supervise actual lessons.

Check Tests

⁵ <https://www.gov.uk/government/statistical-data-sets/ins01-numbers-of-approved-driving-instructors>

⁶ <https://www.gov.uk/trainee-driving-instructor-licence-the-rules/overview>

The document outlines current practice.

Regulatory Compliance

The document details current options.

The case for change

The enhanced standards check

There is no real justification in including a proposal that is already implemented and will be introduced in April 2014 in a consultation document. However, by being included it does allow observations to be made on the failure of the DSA to properly prepare the change.

Driving is a practical skill. An encyclopedic knowledge of the Highway Code and an ability to sit in front of a computer and click a mouse while watching computer generated imagery (CGI) and obtain high scores does not translate into a safe practical driver.

Driving skills must be taught, on a one to one basis, in a vehicle.

The ability to impart tuition that achieves the skills must surely be more important than assessing if the instruction was “non-discriminatory”. Driving tuition, unlike classroom tuition, is made on a one to one basis. If the pupil considers the instructor to be biased or discriminatory, they will seek a new instructor. Such politically correct issues are self regulated; the pupil goes elsewhere.

The DSA has published the new standards check form, showing the target headings.⁷, but then admits that how these heading are to be assessed will not be determined until October 2013, when it will publish guidelines to examiners. The arrow is being fired into the tree and the target drawn around it. Confidence in the credibility of the DSA is declining.

An enhanced qualification process

The consultation document states that fewer than 50% of those who start the qualification process pass the three tests and become ADI's. This statement is very economical with the truth.⁸

In September 2011 the pass rate for the part 1 test (Theory and Hazard perception) was 50.4% and the pass rate for part 2 (Practical Driving Ability) was 52.6%

⁷ <https://www.gov.uk/government/publications/adi-standards-check-form-example>

⁸ <https://www.gov.uk/government/publications/adi-part-1-2-and-3-test-pass-rates>

The Consultation document does not make it clear if the proposed changes apply to the whole of the qualification process or to just the part 3 examination, which in 2011 had a pass rate of 31.4%

The consultation document states that "Great Britain has some of the safest roads in the world. ADI's have contributed to this." Surely a most important factor is that persons qualifying as ADI's must first demonstrate a superior driving ability; a practical skill, not an encyclopedic knowledge of "standards" and "targets".

The consultation paper suggests that the fees charged by training companies average £2600, and given the high failure rate for many people the investment is wasted. This is undoubtedly true, but the suggested remedy cannot seriously be a lowering of standards! Far from improving the quality of training the proposed route will place new drivers at risk and considerably lower driving test pass rates.

If there is realistic concern as to why so many people waste money attempting to become ADI's the answer lies in the current advertising and enrolment practices of the national training companies.⁹¹⁰¹¹

Claims that ADI's can earn £30k pa net are not realistic. If a modest 40% of income is overhead then the gross takings must be £50,000. Allowing an ADI to take four weeks holiday, with an average of £20.00 per hour for lessons it would require the ADI to work 52 hours per week and allowing just 30 minutes between lessons a driving instructor working five days per week would have an average daily work time of 14 hours per day!

With an average lessons-to-test figure of 40 hours, the ADI would also need 62 new pupils per year. Given the DSA figures of 742,500 new drivers per year, and the current number of authorised driving instructors in the UK being in excess of 52,000 the average per instructor is only 14!

The claim of £30k net is unbelievable and even £30k gross is barely creditable.

The DSA has long been in a position to investigate these claims and to refer the issue to Trading Standards and the Advertising Standards Authority. Why it has not done so is unknown.

The consultation document "assumes that most learner drivers would choose to be trained by an ADI and that they would only consider using a trainee licence holder if offered a discount."

There is no factual evidence to support this assumption. The majority of learner drivers are only made aware of the two types of licence, Green and Pink, when entering a test centre to take a

⁹ <http://www.bbc.co.uk/blogs/x-ray/2010/02/surepass-red-driving-instructor-training.shtml>

¹⁰ <http://www.moneysupermarket.com/community/forums/t/red-driving-instructor-tuition-costs-38300.aspx>

¹¹ http://www.blogistan.co.uk/blog/mt.php/2008/11/12/the_great_tuition_rip-off

driving test for the first time; even this information poster has been removed during the past year from most test centres.

The DSA is correct in saying some form of supervision is needed for trainee licence holders.

1.1 Civil sanctions

The document gives a reason for asking for civil sanctions but fails to offer justification.

4.0 Option for change

Conformation to EU directives cannot be challenged by the registrar, but a case should be made for ministers to do so. Experience shows the poor quality of driving skills shown by immigrants from EU states, (mainly East European), do we really want to allow the obvious poor quality of driving instruction to dilute the current standard in the UK.

Do Nothing

By stating that the introduction of the new standards check is part of aligning legislation with directive 2005/36/EU, the DSA opens itself to the accusation that these changes are political rather than for the improvement or maintenance of driving tuition quality.

The DSA is concerned that the current qualification system does not align with the competences set out in the national standards, that many applicants are unable to complete and pass the part 3 exam, and allows the applicant to give unsupervised instruction as part of the qualifying process. And for these reasons considers this option not viable.

However, the reasoning is flawed. It is more important that a prospective driving instructor is able to teach the practical skill of driving than be able to identify a verbose list of sub-sections¹² that compromise a breakdown of the overall knowledge and ability needed to drive a car. The current part 3 test¹³ is designed to test the core competence of a potential instructor in delivering a lesson, identifying faults, explaining the consequences and remedying the fault.

That a large number of persons begin training and fail is not an indication that the qualifying process is wrong, it is an indication that training organisations are at fault.

The need to include some supervised lessons given by PDI's is accepted, but the DSA proposal for all lessons to be conducted that way is not financially viable. A small change in the rules relating to ADI sponsorship of PDI's would solve this issue.

The DSA expresses concern that ORDIT fees would have to be significantly increased as it does not currently cover costs. As the proposed changes will put trainers and training organisations to a great expense to become approved by Ofqual, this should not prove an issue.

¹² <https://www.gov.uk/national-standard-for-driver-and-rider-training>

¹³ <https://www.gov.uk/adi-part-3-test/overview>

Alternatively, as there is no legal requirement for ADI trainers and training organisations to be ORDIT registered, ORDIT could be closed as per the proposal to move to the VQ route.

Continuing the present qualification route is the least costly, viable option.

Option 1: introduce a vocational qualification to replace the current qualifying test.

The move to a vocational qualification removes the requirement for a potential ADI to undertake a theory and driving test (Parts 1 & 2 of the current process) to prove that they possess a high standard of driving skills. It is right that a poor driver should be allowed to give driving instruction?

A vocational qualification is derived from building a portfolio of modules or credits until a high enough score has been obtained to obtain the certificate. At no stage is the candidate ever required to prove that they can incorporate all the modules concurrently or to a consistent standard.

A second concern is the manner in which VQ can be incorporated. The VQ would only be delivered by recognised training centres, therefore every ADI currently undertaking driver instructor training will need to become approved. As there will be a requirement for qualified internal assessors and external verifiers, the costs of approval will prove prohibitive for many independent and small organisations, which will result in them leaving the field and returning to learner driver instruction to swell an already over-populated market. Within a short period, driver instruction training will be available only through large organisations such as the AA, BSM and RED, some of whom are already subject to complaints about their ethics.

The third concern relates to the manner in which assessments could be made. Being a work based qualification; the assessments would need to be carried out while the candidate is working. How could this be achieved?

Under this proposal the trainee could not give paid instruction to a learner unless accompanied by an ADI. Would this mean that the ADI works for free? Or the learner pays a higher fee? Neither suggestion is probable. The DSA has avoided this issue by stating that it would be an agreement between ADI and trainee, but in reality this can only work if the ADI is being paid through the trainee's training fees.

The consultation document persistently makes the claim that "the option would incur none of the additional costs arising from employing DSA staff to undertake a role" but ignores the obvious fact that someone would need to cover those costs and ultimately it would be passed to the trainee as fees.

The document claims this option would give benefits to the driver training instructor industry and the trainee instructor including:

- A reduction in the costs of qualification for the trainee

- This is untrue. There would be fees to register the student onto a qualification, fees to certify the student has completed each credit bearing unit.
- The training organisation would need to cover the costs of instruction and attendance of an ADI while lessons were being given by the trainee. Many would seek, in the first years to cover the cost of accreditation by the awarding body.
- All these costs would pass to the trainee as course fees
- An increased likelihood that the trainee would gain the overall qualification
 - This would be at a cost of reducing the standard of the training. There is sufficient evidence of the effect of similar training schemes for plumbers, electrician and mechanics that are treated as qualified but lack the actual ability to carry out the role properly.
 - Road safety demands that this is not allowed to happen to driver training.
- Increased employment mobility across the driver training sector
 - This is a euphemism for allowing less qualified and lower standard instructors from EU states to work in the UK unchecked. There is no measurable migration of UK trainers to other countries.
 - There is also the concern that such instructors would not be subject to any standards checks.

This option is fraught with danger. It would have a massive detrimental effect on the future quality of driving instructor training and thereby on the subsequent quality of learner driver training. It would have the detrimental effect of raising training costs and would place future instructor training into the hands of a small number of national training companies. The DSA assumptions on cost are very much underestimated. This option should be rejected.

Option2: improve the existing route to ADI qualification

Amendment to the part 2 test involves the inclusion of a commentary while driving. As this is a requirement in most advanced driving tests there would be little opposition to its incorporation. Why the DSA feels it would be necessary to reduce the number of manoeuvres from four to two is unclear as the overall test time would not be affected. Further, no additional costs would be involved.

The document states that the existing part 3 assessment route would be amended to provide some limited improvement to the way it aligns to the national standards. This is very disconcerting as it implies that the purpose (as does option 1) is to move away from testing a candidate's ability to actually teach and impart driving skills to a pupil in favour of the knowledge of a verbose list of driving objectives.

Nor is there any justification for suggesting that changes would need to be limited, other than to persuade a decision towards option 1, regardless of option 1 or option 2 being chosen, the

overall effect if aligned to national standards would be an influx of sub-standard instructors entering the industry.

The document suggests that this will involve removing the role-play and pre-set scenarios, as there is a suggestion that trainees rehearse the pre-set tests, and require the candidate to attend with a real pupil. It suggests that the emphasis would include risk management and be more realistic in that the candidate would need to plan a structured lesson that suits the needs of the pupil. It states that this will mirror the changes for the standards check for ADI's. However, the candidate will naturally rehearse the lesson with the pupil before attending the test, meaning that there will still be some degree of artificiality in the test.

More worrying is that the DSA has already stated that it has yet to determine how the objectives on the standards check can be measured. This will naturally have an impact of a part 3 test. How will an examiner judge a candidate's ability to spot and remedy a fault, if the pupil used is of test standard and performs the "test lesson" without mistakes? How will an examiner judge, on meeting candidate and pupil for the first time that the lesson is "structured and suited to the needs of the pupil" when the candidate may have already spent several hours with the pupil and has developed a manner that takes in to account issues not apparent in the test lesson?

In addition, the proposed changes to the trainee licence scheme, for both option 1 and 2, may make it impossible for some candidates to qualify at all if the role-play option is removed.

The DSA asks for comment on the accuracy and assumptions used for the implied costs of option 2. The assumptions are buried in a number of referenced documents and difficult to follow but it does seem that these costs have been greatly overestimated.

The document states that this option would have the benefit of not requiring any change to the ADI training industry. This is not necessarily a good thing. While the option 1 route would be costly and leave ADI training in the hands of a few large organisations and require the closure of the ORDIT, allowing the option for anyone to offer ADI training without any form of registration or training is a serious issue that needs to be addressed.

The DSA should investigate a change in regulations to require ADI's to obtain a qualification, possibly through Ofqual, before being permitted to join ORDIT. This would have two benefits; sub-standard ADI training would cease and costs to the DSA for ORDIT inspections would be reduced.

The document implies that this option would only achieve a partial alignment to the national standards, however this is not true. The DSA is as capable as Ofqual to devise the assessment so that the requirements of the EU directives are met.

Option 3: make reforms to the trainee licence scheme

Although the consultation document offers this as an option 3, the same requirement exists for options 1 & 2.

In all cases the proposal would be impossible to implement without a substantial rise in costs to the candidate. This alone could prevent many potential instructors from commencing training,

and, as it is reasonable to conclude that there would not be a 100% pass rate, some candidates would have paid far higher training fees than current fees and still not become registered as ADI's. (A stated concern of the DSA in the document.)

The proposal suggest that a trainee would apply for an "exemption" that would allow them to deliver paid instruction for a period of six months only. No further exemption would be allowed, however the document does not make it clear as to whether the trainee, if failing a part 3 test, could still take further part 3 tests after the six month period.

The conditions would require that;

- The trainee would need to be accompanied by an ADI on all occasions.
- The ADI badge would be displayed in the vehicle during the lesson
- The pupil would be informed that the lesson was being carried out by a part qualified instructor
- The trainee would be allowed to give unpaid lessons without an ADI or an exemption

We can conclude that no ADI would be prepared to accompany a trainee without payment and must ask the question as to how both ADI and trainee would receive payments.

We can conclude that if emphasis is to be made to the pupil that the instructor is part trained/qualified that it will bring about a reduction in the cost of the lesson; and it is unlikely that a pupil would agree to pay two fees, one to the trainee and one to the ADI.

The DSA has opted out of addressing this issue by stating that payment would be a matter between the ADI and the trainee.¹⁴

Option 1 would see a substantial increase in fees to provide income to the trainer. Option 2 would need to do the same but it could be circumvented by the trainer ADI using his own pupils and asking them to agree to allow his trainee to conduct the lesson, under supervision. The trainee would not need to have the exemption as this would be unpaid instruction.

Related items

Civil sanctions

It is difficult to understand why the DSA feels there is a need for this proposal. The single example quoted is failure to display a badge while giving paid instruction and the question must be asked as to why this is deemed so vital.

¹⁴ <https://www.gov.uk/government/publications/adi-registrar-webchat-9-july-2013-questions-and-answers/ask-the-adi-registrar-about-modernising-driver-training>

Drivers are not required to display their driving licence at all times, just to be able to produce it to authorised persons on demand. Why should an ADI badge be any different?

Although the DSA denies it this proposal seems little more than a means to raise revenue.

Revisions to the standards check booking system and fee structure for registration.

The fixation of government departments to do everything on-line is worrying, although a change to the way in which check tests are booked is long overdue. There should also be concern that the DSA admits to currently giving three attempts for an ADI to pass a check test.

The drop out rate, which must be the biggest expense, could be eliminated completely by changing the way in which bookings are administered. The ADI badge is valid for 4 years, if all ADI's were required to book a check test at any time during the third year the cancellation rate would be eliminated. A small additional fee could be charged if the ADI forgets and has it carried out in the fourth year and refusal to renew the licence if the check test had not been carried out would ensure compliance.

It is difficult to believe that the current income does not adequately cover the costs involved, although ADI's who need second or even third attempts should be required to pay a minimal charge, similar to a driving test fee, for the additional attempts. Separating the charges would inevitably lead to increased fees and be viewed by the majority of ADI's as a cynical move to increase revenue.

The ADI grading structure

The current grading system has no practical validity other than to massage the egos of less than 6% of ADI's.

The document refers, in section 5.2, to ADI's who deliver Fleet training or other specialised services to local authorities who require the instructor to have obtained a higher grade in their check test. This assumption is more of a wish-list than a factual requirement given the small number of ADI's who hold the higher grades and small percentage of those who do undertake Fleet and specialist training.

There is no practical value or incentive for the ADI as the higher grades do not, as stand alone issues, bring an ADI more work or higher rates, and the great majority of pupils are unaware that such grades exist.

As the DSA has already moved away from testing ability in favour of the EU directive for compliance to standards, this would be a good opportunity to end the grading system. Ability can be graded; standards are either met or not met. This is all that should be measured.

Ministers, however, should keep in mind that once the EU directive allowing instructors from other EU countries to work in the UK without being subject to a standards check there could be, in principle, a legal challenge to the continuation of a standards check for UK instructors on the grounds of discrimination.

Consumer information

The DSA has a “find your nearest” facility but very few ADI’s have any pupil feeds from this site, mainly as the DSA does not spend time or money promoting the site to search engines. It is not enough to expect new pupils to think of the DSA or any government website when looking for driving lessons.

The majority type “driving lessons” and a postcode into Google and find numerous commercial websites.

The consultation paper states that commercial websites provide limited information about driver training services and that the Registrar is in a unique position to publish information about ADI’s, citing specialisms and standards to which they operate. This is untrue, Commercial sites have direct input from the ADI and contain as much, or as little, information as the ADI feels necessary. To suggest that the information should be the same for every ADI and by that assumption a DSA site would be preferable to the consumer is to admit little or no knowledge of marketing. Most consumers wish to know about fees and discount packages, including special offers. How will the DSA keep this up to date for ALL ADI’s?

Requalification

It does not seem wise to allow that after an indefinite period of absence from driving tuition the resumption of paid tuition should be allowed without any form of check upon the person’s ability. Equally, the current 12 month period is too short. It would be more practical to suggest a three year period, given that an ADI licence covers four years, after which a part 3 test would be required before an applicant was allowed back on the register.

Voluntary removal from the register

It is difficult to understand why this question is being asked. The Registrar is already acting on a request and presumably is not making any refunds of fees. Why is it felt that this needs to be enshrined in legislation? No supporting data as to the number of ADI’s who request removal from the register has been provided, although it was felt important to mention an average of 25 ADI’s ask to re-qualify each year . Is this perhaps a subtle way to introduce a fee for this process?

Summary

The consultation document comprises 21 printed A4 pages; however much of the content are assumptions and conclusions based upon referenced data. To follow these references, and further references made within those references, brings the complete documentation to over 1000 printed A4 pages.

Given the short period of time allowed for responses, and the amount of questionable supportive material within the references it is reasonable to suggest that the consultation process is biased towards a predetermined outcome.

Ministers should look carefully at the full implications of the two prime options stated in the document.

The consultation document seriously underestimates the overall value of the driving instruction industry and the modal income for driving instructors. It ignores the current ratio of provisional licences issued per year to registered driving instructors, (ADI &PDI) and implies that an already overcrowded market is in need of further saturation.

The DSA expresses concern at the low pass rate for the current part 3 examination and uses this to support the proposal to move the qualification process to a VQ route; however the DSA fails to acknowledge overwhelming evidence that the selling of training courses by major training companies to unsuitable candidates is the main factor for the failure statistics.

The cost and impact assessment of option 1, the DSA preferred option, have been grossly underestimated. An ADI wishing to continue offering instructor training would need to register as a provider with Ofqual and there would be costs involved with the registering of a candidate for the examination and for the issuing of certification. Additional costs would be incurred by the necessity of external assessors.

Ministers should also remain aware of the impact on the quality of driver instruction if the VQ route is followed.

The VQ route will eliminate the need for a potential instructor to demonstrating personal quality and skills as a driver. Current DSA statistics show that 75% of persons wanting to train as driving instructors cannot pass the theory and practical driving tests.

Vocational Qualifications which are gained by amassing a series of credits over time have been largely discredited in the majority of business environments. They result in a “qualified” person who is unable to interlace the various credit units and is unfit to work in the industry; such a result in the driver training field would have a devastating affect upon road safety.

The costs and impact of option 2 has been grossly overestimated. This option requires a virtually zero cost change in the part 2 test and a proposal to amend the part 3 test to exclude the role-play option and require the candidate to attend the test with a learner driver. This requirement would have no cost to the DSA but would increase the cost of tuition for the trainee.

The DSA tries to argue that this option would only meet national standards in part, but offers no explanation as to why this should be so. If Ofqual can be expected to cover the national standards and the DSDA proposes to do so through the amended check test it should be possible to do the same for the part 3 test.

Implementing option 2 will cause an increase in costs to the trainee, but only minimal increases to the DSA. It is the only option that preserves the high standard of training and driving in the UK.

The proposals to require a trainee driving instructor to have an ADI in the vehicle for all lessons is impractical without heavy increases in training fees, although some control is needed in view of the number of trainees who do not pass the part 3 examination.

Ministers should consider amending this option to require 25% of lessons to be supervised by the training ADI or organisation with a possible caveat that the first ten lessons must be supervised. This would lessen the inevitable increase in training fees.

Ministers should also consider the unsuitability of current regulations which allow the training of driving instructors by any person, qualified or not. While option 1 does this by default, the arguments against option 1 are stronger. Ministers should consider amending regulations, if necessary introducing legislation to restrict driver instructor training to ADI's who join ORDIT.

Ministers should also look carefully at the DSA declaration to comply fully with the EU directive 205/36/EU. This bombshell hidden within the consultation paper would allow driving instructors qualified in other EU countries to enter the UK and provide driving lessons without any initial assessment of subsequent checks on their ability and standards.

As it is widely acknowledged that driving standards in other European countries are far below British standards, and the majority drive on the right hand side of the road, this open door is a serious threat to road safety in Britain.

Ministers should also consider that as these drivers would not be subject to check tests there would, once a significant number were operating in the UK, be a potential case for a legal challenge to the continuation of the check test as being discriminatory against UK ADI's.

It is difficult to understand why remaining items are included in the consultation paper, civil sanctions and voluntary removal, other than as a means of increasing revenue.