Opinion: EANDCB validation IA

Origin: domestic

RPC reference number: RPC-3817(1)-DfT-DVSA Date of implementation: 30 November 2015



# Guidance for examiners carrying out motorcycle trainer standards checks

# **Driver and Vehicle Standards Agency (DVSA)**

**RPC rating: validated** 

### **Description of proposal**

In November 2015 the DVSA introduced guidance for examiners of motorcycle instructors, setting out changes to the conduct of standards checks. These changes were intended to improve quality assurance of motorcycle instructors and refocus examination on how training is delivered, so that motorcyclists are better prepared for riding on public roads.

#### Impacts of proposal

While the guidance is intended for use by DVSA examiners, the assessment explains that motorcycle instructors would also wish to ensure they are familiar with how they will be inspected. The BIT assessment states that approximately 2,000 motorcycle instructors are permitted to provide motorcycle training; it is assumed that half of these will read the guidance, based on the level of attendance at initial information events provided by the DVSA. To calculate the resulting cost to instructors, an average reading speed of 200 words per minute is applied to a document length of 5,334 words; taking into account the need to consider its contents, initial familiarisation time is estimated at one hour each for 1,000 instructors. Using an uplifted average hourly wage of £14.40 this generates an initial familiarisation cost of £14,400. This cost is assumed to recur every four years, as instructors refer back to the guidance in preparation for their next standards check.

The assessment also estimates a cost to instructors of attending initial information events provided by the DVSA prior to implementation of the new standards check, in order to explain how it would be conducted in future. Based on an attendance at 20 information events of approximately 500 instructors, a one-off cost to business of £10,800 is estimated. Combining this with the familiarisation cost of reading the guidance, the equivalent annual net direct cost to business (EANDCB) of the measure is estimated to be zero, when rounded to the nearest £0.1 million.

## **Quality of submission**

The assessment provides a sufficient level of evidence for the RPC to be able to validate an EANDCB of zero. The main business impact that has been identified by

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the regulator is the cost of reading and referring back to the updated guidance. However, the assessment could be improved in the following areas.

The assessment appears to include the cost to instructors of attending initial information events as a direct impact on business. However, as these events involve the education of business through regulator activity, this element of the proposal would seem to fall under BIT exclusion L2 'educational, communications activities etc. by regulators', and should therefore be included in the regulator's non-qualifying regulatory provision (NQRP) summary. As this would serve to reduce the direct cost to business, the RPC is satisfied that it would not alter the EANDCB when rounded to the nearest £0.1 million.

With regard to familiarisation costs, the assessment would also benefit from a more thorough explanation of why only half of motorcycle instructors would need to read the guidance. Furthermore, to estimate the time businesses would take to do so, a reading speed of 200 words per minute is used (including a comprehension rate of 80 per cent). The assessment would be improved by explaining the basis for this assumption, making explicit reference to the relevant source.

#### **Departmental assessment**

| Classification                                         | Qualifying regulatory provision |
|--------------------------------------------------------|---------------------------------|
| Equivalent annual net direct cost to business (EANDCB) | Zero                            |
| Business net present value                             | -£0.03 million                  |

#### RPC assessmenti

| Classification               | Qualifying regulatory provision (IN) |
|------------------------------|--------------------------------------|
| EANDCB – RPC validated       | Zero                                 |
| Business impact target score | Zero                                 |

Michael Gibbons CBE, Chairman

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<sup>1</sup> For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000

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