



This document was forwarded by Neil Greig, IAM RoadSmart Policy & Research Director. It forms the basis of IAM RoadSmart's response to the consultation document which will be published in due course on the Department of Transport website.

Modernising Motorcycle Training Courses - Consultation

This is the DRAFT response to the Modernising Motorcycle Training Courses consultation that the **Motorcycle Industry Association will be submitting to the DVSA on behalf of our members (the wholesale side of the motorcycle industry)**. We usually send 2 responses as there are occasions where your views and priorities as trainers are different from MCIA members as you will be directly affected by these proposals.

We have sent this to you to gather your opinions as ATBs and/or Instructors and get your feedback on how we should respond on your behalf (MCITA and MCIAC members) Please do take the time to let us know how you feel. We will consider all the feedback and develop a response, where we have conflicting feedback the response will use the opinions of the majority but we will mention any areas of discord.

In addition, we urge as many of you as possible to complete this consultation which has been written in such a way as to allow you the space to express your opinions and give feedback and ideas for DVSA to consider when implementing any changes. A big response will show DVSA that there is strength of feeling on these issues.

Responses to DVSA should be completed online via <https://www.gov.uk/government/consultations/improving-moped-and-motorcycle-training/improving-moped-and-motorcycle-training>. Your answers should be submitted by 11.45 on Friday 17th February.

Please let us know your views on our response by end of Friday 13th January, we will put them together and send the 'training industry' response to you for information.

It may be helpful to have the consultation document to hand for more details about DVSA thinking, we have only reproduced the questions below.

Question 1. Do you agree that we should implement a new combined CBT/DAS instructor qualification assessment?

Yes, separating the DAS qualification for the requirement to be able to down train Instructors makes good sense as does a CBT and DAS combined assessment. Not all Instructors want to down train other Instructors, many are only interested or only have the opportunity, to train riders. This way each individual Instructor has a choice and should speed up the initial DVSA approval process for DAS qualification which will be very welcome.

Question 2. Do you agree that down-trained instructors should have a limited period giving instruction, before being required to undertake a qualification assessment? If so how long should this period be?

Yes, we agree that there should be a limited period before qualification assessment of down trained Instructors. When we last surveyed our members on this 24 months was the most popular response, but there was a very wide range of responses from 6 months to 48 months, with a small minority not in favour of any time limit. Please note that if any period limit is imposed there must be improved throughput for DAS qualification as continuation of the long delays that have been experienced at Cardington this year would further curtail ATB activity. It is of utmost importance that the volume of CBT training can be catered for and that sufficient Instructors are available.

Question 3. Do you have any additional ideas or suggestions on how we could improve CBT/DAS instructor qualifications?

We favour a vocational qualification route to qualifying which is based upon the National Rider Training Standards and delivered by ATBs who wish to offer this type of instructor training. This was an option under the original modernising driver training consultation paper issued in 2013.

Some improvements which have been mentioned over the years by our trainer members include using 'live' students and carrying out DAS qualifications at the ATB premises. Also paying a set fee for DAS qualifications rather than attempting fee recovery from CBT certificates would reduce the number of failures and therefore make more qualification slots available for those who have taken the time to train carefully through responsible ATBs. Waiting times for DAS qualifications are a big concern for our members and need to be addressed.

Question 4. Do you agree that we should make changes to the CBT syllabus?

Yes, CBT works well when it is delivered properly but the amendments suggested may help keep riders safe when on the very different road environment that existed when CBT was first introduced. The proposal to combine element B&C is welcome but consideration should be made for the elements to be delivered out of sequence if circumstances dictate, for example if weather conditions are poor and classroom sessions would more appropriate at that time. This could allow A&D to be delivered before B&C, especially useful for CBT returners. As long as the whole syllabus is covered before the on-road element then this should be considered.

Question 5. Do you agree that the five elements of CBT should be condensed to four?

Yes this seems sensible

Question 6. Do you agree that instructors should ensure trainees are appropriately dressed for CBT? If the standards expected are the same as those detailed for test appearances, then yes we agree.

Question 7. Do you have any additional ideas or suggestions on how we could improve the CBT syllabus? Not without straying further into test training however there is still a need to consider making an alternative CBT available for those who repeat CBT. There needs to be clear guidance for ATBs offering return CBTs as currently there is uncertainty to what is acceptable. The previous consultation alluded to the DVSA providing training materials to assist the industry in standardising their approach with example training material.

Question 8. Do you agree to the introduction of mandatory standards checks? In theory yes, all motorcycle instruction should be of an agreed standard and subjected to regular quality assurance. A number of organisations (including MCIAC & IAM Roadsmart) are moving towards competency based assessment under awarding organisation guidelines. These styles of assessment should be considered as part of future standards checks requirements.

However this is a complex issue as the definition of 'road based motorcycle training' is not clear. If the intention is to encompass all forms of post-test road riding too, then a one size fits all approach is not likely to work given that there are several 'assessment' schemes and charitable organisations to consider. We would welcome a chance to discuss this further, but agree in principle.

Question 9. Do you agree that all instructors should be subject to mandatory quality assurance? Yes, but the details are answered within the comments made for Question 8 and we feel that DVSA should consider adopting a quality assurance regime that checks ATBs not individual Instructors, the frequency of checks could then become greater at the same cost. If individual instructor monitoring does continue then it should be based on the ability of the instructor (risk based). This could see an inexperienced instructor being monitored more frequently than those who have demonstrated a high standard of instruction previously however this should never be below the current frequency of once every 4 years. ATBs could demonstrate their ability to contribute to the quality assurance regime through robust internal systems (for example MCIAC requirements) which could compliment the DVSA standards check requirements.

Question 10. Do you have any suggestions on how we could improve standards checks for instructors overall? More frequent checks and the use of customer feedback in line with MCIAC accredited ATBs could only be of benefit. We feel that DVSA should consider adopting a quality assurance regime that checks ATBs not individual Instructors, the frequency of checks could then become greater at the same cost.

Question 11. Do you agree that DVSA should explore setting up a training option to upgrade motorcycle licence entitlements?

Yes, we strongly agree that this option should be implemented. However there are ATBs issuing CBT certificates without following regulations and therefore the public

and DVSA must be sure that any ATBs with the authority to carry out this licence upgrade are operating to very high standards at all times. A standards check once every 4 years does not seem sufficient in this regard. Customer feedback is as mentioned an intelligent low cost indication of what happens at an ATB, all day – every day. Robust Quality Assurance over and above current requirements is key to the success of this proposal

In implementing this training upgrade it would be most beneficial if riders were offered the opportunity to carry out the training on the bike they wish to ride once their licence is upgraded. This would help them get to grips with much larger motorcycles than the traditional 650cc machines used for both A2 and A tests and enable them to become familiar with their new motorcycle under the supervision of a DAS Instructor.

The ability to upgrade licences could be part of the earned recognition (ER) proposal for ATBs providing that the ER standards adopted are rigorous and have robust quality assurance built in. The best ATBs should be rewarded for their commitment and professionalism by being an 'upgrade centre'. This would encourage more ATBs to improve their standards.

Question 12. How do you see a training option working in practice?

There is no reason why this shouldn't work and become a normal part of an ATBs business as long as the quality assurance is robust. The finer detail is another area that we would welcome further discussion on to enable us to consult with all our trainer members to enable ATBs of all sizes to offer this upgrade if they wish.

As the rider has already passed a DVSA test with a DVSA examiner to prove competence, then in theory the upgrade should not be any more difficult to control than the CBT regime - theoretically it should be easier given the rider is already competent based on their passing of a DVSA test previously. They are also likely to be better informed about what would improve their riding (similar to an ERS course).

As per question 11 Robust Quality Assurance over and above current requirements is key to the success of this proposal.

Question 13. Do you agree that learners who complete their CBT course on a machine with automatic transmission, should be restricted to riding an automatic machine? Yes, too often (particularly in the London area) students are only offered automatic machines regardless of their preference as it is quicker and easier to get them to the required standards.

Question 14. How should learner riders with an automatic restriction on their CBT certificate be able to upgrade their entitlement to ride a manual machine? A simple upgrade CBT that covers only the additional aspects of machine control and handling that are required with an additional road ride to complete the assessment. The MCIAC use a competency based assessment which is suitable for all types and style of on-road riding. This type of assessment could be suitable.

Question 15. Do you consider that the Secretary of State should have powers to revoke a CBT certificate if the learner rider accrues six or more penalty points? There is no reason why a rider on CBT only should be subject to different rules than licensed riders and drivers. However this should only apply to the first 2 years of

riding (digital CBT records would be needed for this) it should become 12 points after this period.

Question 16. Should DVSA consider other measures for learner riders who have accrued six penalty points? [Answer to question 15 applies here.](#)

Question 17. Do you agree that the CBT administration process should be on a digital platform? [Yes, we strongly agree that this process should be digitalised and have campaigned for this for many years alongside our colleagues at The National Police Chiefs Council.](#)

Question 18. Do you think that learner riders should take a theory test as part of or prior to CBT? If yes what format do you consider the theory test should take? [Yes, all potential riders/drivers should take a theory test before being allowed to drive/ride. So whilst we support this proposal it should be applied to all provisional licence holders. Any move to insist that only motorcycle riders should take a theory test before using the road would be strongly opposed, this must be implemented for all. There is no reason why anyone using the road should not know the rules of the road. As a compromise some form of abridged theory test or check that must be carried out by all CBT candidates to ensure they have at least read the Highway Code would be acceptable. This could be online and completed before the student attends CBT training. Cost here is a consideration and we feel that the process of obtaining a motorcycle licence is already too onerous. Again further discussion would be welcome on this topic.](#)

Question 19. What other measures do you think DVSA could put in place to educate learner riders? [We don't feel that DVSA is best placed to actually educate learner riders, however DVSA can help riders to make the best decisions regarding their training and make it clear what students should expect and of course ensure that DVDSA quality assurance is robust and that DVSA DAS Instructors are of a high standard. Additional You Tube videos discussing/demonstrating CBT activity could be useful to inform the public about what to expect and provide instructors some guidance on 'good practice' which currently does not exist. Some ATBs already do this themselves.](#)

Question 20. Do you agree with the principle of earned recognition? [Yes absolutely. As DVSA only recognise, but do not regulate ATBs it is unfair to suggest to the public that all are equal. There should be schemes in place for those businesses who wish to demonstrate professionalism. It is the business name which the public engage with and not individual instructors.](#)

[There is a massive difference between ATBs and it seems unfair that those who invest time and money in their business are in the eyes of the public the same as those who run on a shoestring, cutting corners to maximise profit.](#)

[\(ER and ERS are a bit close for acronyms – we suggest this is changed, some may confuse Enhanced Rider Scheme with Earned Recognition standard?\).](#)

Question 21. What evidence do you consider that instructors should provide to gain ER? [We don't see how ER can be given to individual Instructors as the search used by the public to find trainers is by ATB. We believe this should be an award to the ATB not the individual Instructor with the ATB owner ultimately responsible for](#)

standard of training given. However individual instructors could benefit from earned recognition if they work within an ATB with ER status. This is currently how MCIAC operates by allowing those instructors in accredited ATBs to attend an instructor course. The industry should work with DVSA to become empowered and responsible for professionalism within its own ATBs. The relationship should become one of working together, rather than a perceived inspection regime. Collaboration between the DVSA and ATBs (or other industry body such as MCIAC) would raise standards quickly and efficiently.

Question 22. What benefits do you feel DVSA could offer to encourage instructors to gain ER? See comments above. DVSA should highlight any ATB that meets ER standards. It should be made clear to potential riders just what that standard means. The ATB should be allowed to use an ER logo on their own websites etc. We do not feel that there should be any reduction in DVSA's quality assurance as once every 4 years per Instructor is not excessive. As detailed in Q9 and 10 we feel that DVSA should consider adopting a quality assurance regime that checks ATBs not individual Instructors, the frequency of checks could then become greater at the same cost. ATBs with ER could also be placed at the top of web searches to highlight their achievement.