

## **FAQs on the Part 3 changes: A NASP document**

Why are DVSA making the changes? The current low qualification rates, primarily driven by the pass rate of less than 40% for the current ADI instructional ability test, are failing many of those people who invest significant time and money in seeking to join the Register of Approved Driving instructors. Even those that are successful, often find that they have to undertake immediate additional training in order to pass the standards check and remain on the register.

Aligning the qualification and post-qualification arrangements will avoid this and provide a more level playing field that enables newly qualified instructors to compete against more experienced ADIs from day one. The changes are, therefore, very much in line with the government's commitment to support business and reduce unnecessary regulatory burden.

### **When are the changes to be introduced?**

The intention remains to implement the announced changes on 2nd October 2017. The format of the ADI Part 3 test is set out in regulations so a regulatory amendment is required. It is always difficult to state that this will be achieved on a certain date, but the industry, of course, needs to know and work to an implementation date, and we are on track to achieve this. The Agency has not kept its intentions to change the ADI Part 3 a secret. It was set out in our 2016/17 business plan and was reaffirmed in September after surveying the ORDIT organisations preparedness for the change. Two-thirds of the training organisations who responded said that they had already started to make changes to their training, whilst most of those who had not, had been awaiting confirmation that the changes were going ahead.

### **So are the core competencies and lesson themes in the existing Part 3 no longer relevant?**

We are attempting to stop the examination process setting the training agenda. The changes to the practical car test are designed to broaden the training that learners receive pre-test so that they are properly prepared to become safe and responsible drivers, not just to pass the test. The same principle very much applies here. We are not dismissing the core competencies or saying that the lesson themes covered by the current test are not important. We would still expect them to be included in training. However, the emphasis will be on moving away from 'what' is taught to 'how' and ensuring that that effective learning is taken place; all of which aligns to our evidenced based National Standard.

Similarly, we are not saying that role-play is not a valuable tool in the training environment. However, delivery of this consistently in the testing environment is more difficult and the Agency was also hearing that examiners did not always respond in the same way as a learner driver. Therefore, we successfully moved away from the role-play approach in the assessment of qualified ADIs in 2014. We have heard trainers saying that it is not right that a newly qualified ADI gives their first real lesson after qualifying.

Ending role play here will align the pre and post qualification tests, thereby providing a more level playing field that enables newly qualified instructors to compete against more experienced ADIs from day one. The changes are, therefore, very much in line with the government's commitment to support business and reduce unnecessary regulatory burden.

### **Won't the changes have an adverse impact on test validity and reliability?**

Some people have alluded that some trainers will be able to offer what is described as a short cut training course. Instructor trainers must accept greater responsibility and accountability for ensuring that their trainees receive the right quality and breadth of training to obtain the range of competences that they will need to be a successful ADI, not just to pass the qualifying test. To reduce the risk, we want to enhance our ORDIT scheme so that more trainers want to join. We will ensure that consumers have access to much more information, including on performance, to enable them to make a more informed choice of trainer. Through close monitoring of training standards and performance, we will also conduct strict and prompt enforcement against those trainers who circumvent or undermine the system.

Our plans will be set out at forthcoming engagement events with the instructor training industry and our aim is to attract more organisations into the scheme. As well as improving overall standards, it will also help us to reduce the alleged risks.

### **Surely the changes will make the test easier?**

The changes are certainly not about making the qualification process easier. This is about improving completion rates through ensuring that PDIs receive a high standard of training from the highest quality instructors.

There is always a risk in any system that someone may seek to avoid doing the training. It's disappointing that some in the industry assume that many instructor trainers working in a supposedly professional industry, and their PDIs, will look to circumvent the training and present a false lesson at test.

### **How can you let the candidate set the subject for the test?**

PTLLS, and other teaching qualifications, involve 'micro-teaching' as a means of summative assessment of the candidate's ability to ensure that learning takes place. Designed to prepare teacher candidates for the real classroom setting, this also involves the candidate picking the topic.

### **How will the DVSA examiner be able to identify a contrived lesson?**

It's disappointing that some trainers feel that ADI examiners will be incapable of identifying a contrived lesson or conducting a proper assessment when they do this successfully on a daily basis with the standards check itself. It is very unlikely that a trainee who attempts to conduct a one-hour lesson in a very narrow subject will be able to demonstrate that they meet all of the required competences to pass the test.

For a PDI to achieve a 'pass' on the new Part 3 they have to demonstrate competence in all 17 sub-competencies which underpin the 3 main competencies lesson planning, risk management and learning and teaching strategies. For that to happen they need to be skilled in identifying the pupil's specific learning needs, which, as you can appreciate, can vary over the course of an hour, and whilst controlling any risk. In fact, we know from experience that many qualified ADIs fail the standards check because they are unable to adapt the lesson in response to the pupil's performance, or other events, including the unpredictability of other road users.

### **If a pupil lets the PDI down and doesn't turn up is that counted as an attempt?**

No. The fee is lost but the attempt is not lost. As per the introduction of the standards check, the Registrar will be understanding if the pupil lets the PDI down, but we will monitor this to ensure that it isn't a regular occurrence.

### **How will DVSA know the actual trainer to focus attention on if they don't quote a PRN or PDI claims not to have a trainer as it's not essential?**

ORDIT trainers will be required to declare their PRN. If a PDI says that they do not have a trainer, no trainer PRN will be recorded. We will however be informing PDI's that they will need to have a nominated trainer. However, the realistic chance of someone qualifying without professional guidance beforehand is very slim.

### **How will you know a PRN if the trainer doesn't attend?**

As above, ORDIT trainers will be required to declare their PRN. A logbook will be requested and recorded on the assessment form. If no logbook or trainer is recorded, questions would be asked and, again, we would suggest that the chance of qualifying without prior training is very slim.

### **Re monitoring trainers – what if no trainer accompanies PDI and PDI doesn't identify trainer or another trainer in same organisation?**

As above.

### **If you can't regulate the training what sanctions have the DVSA got to challenge those who you don't believe reach the standard?**

The same as now: no difference with the current Part 3. However, we are looking to raise standards so why would a trainer try and 'buck' the process. We will look to cover this off in new conditions relating to ORDIT. We want more trainers to join ORDIT and intend significant promotion of the register to consumers.

### **What sanctions have you got if the trainer isn't an ADI as they don't have to be currently?**

There are very few who are not ADIs. For any training to take place in a car the trainer must be an ADI. The above response re ORDIT is relevant here. The new test will make all ADI trainers more accountable for the quality. They too need to upskill and take ownership. We will specifically be monitoring the first 2500 tests to gather meaningful MI so that we can target those in need of development.

### **What is DVSA's view on the possibility that they have breached government codes of practice on consultations?**

The 2014 response to the Modernising Driver Training consultation was shown as interim as it was not possible, at the time, to say for definite when certain initiatives, such as the changes to the ADI Part 3, would be implemented. No commitment was made to publish a further final report.

Our subsequent collaboration has focused on the National Association Strategic Partnership, which brings together the three largest national associations with a combined membership of over 26,000 (covering both ADIs and instructor trainers), and those on ORDIT that we know deliver the current process and will, therefore, be directly impacted by the changes. We are also in the process of further surveying instructor trainers, PDIs and ADIs who qualified since the introduction of the standards check in 2014.

### **Re tribunal "fit and proper"- what if PDIs are happy with training received?**

The Registrar has wide discretion over what constitutes fit and proper and it is anything that undermines the integrity of the Register of Approved Driving Instructors. We would also add that if the PDI is happy with inadequate training and/or failing the qualifying process, or then failing to demonstrate the level of competence required to pass the standards check, then he/she was obviously attempting to enter the wrong industry.

### **Where will monitoring staff come from as it is not done now?**

DVSA will have a dedicated team of ADI examiners who will solely be responsible for all that is ADI and in addition,

suitably skilled senior managers. The ADI team also carry out greater scrutiny than previously of submitted forms and will continue to do so.

**When DVSA say PDIs learn PST subjects and routes – doesn't the examiner set the route on Part 3 and PDI able to focus totally on subject used on PST day and probably a low risk group of topics (e.g. controls, TIR first time, FLH on motorway)?**

At present yes. However, with the new exam the responsibility for lesson planning, risk management and learning / teaching strategies will fall to the PDI. As you know the lesson starts at the DTC and the PDI will be responsible for demonstrating suitable teaching skills for the three main competencies.

To achieve a satisfactory outcome on the new test will be extremely challenging for an inexperienced PDI.

**“How to Teach” – why not include 17 competencies in Part 3 marking as was indicated in consultations and surveys to date?**

The assessment will mirror the standards check so the 17 sub-competencies will form part of the new test. The surveys were/are about informing the ADI training industry of DVSA's intention to align the Part 3 with the National Driver and Rider Training Standards, and their preparedness for the changes.

**Why is there no requirement for learning logs to provide evidence of competency?**

The Road Traffic Act 1988 doesn't allow for the mandatory use of logbooks. We can however make it a requirement for ORDIT trainers as this is a voluntary scheme.

**Many PDIs come to meet me from outside of my area so booking a time and test that is mutual can be difficult. What is your view if the trainer cannot necessarily sit in? There may also be 2 people in the back anyway examiner and a supervising one.**

It is important regardless of the outcome that the trainer plays a key role and witnesses the positive aspects of the PDI's performance as well as any negative so that a training plan can be devised. If the trainer doesn't accompany or makes no attempt to listen to the debrief: this suggests that they are not taking ownership of their standard of their PDI.

**A lot of full time trainers don't teach learners so what advice do you have for us?**

They need to know 'how' to teach a learner, or any level of driver requiring development, to be in a position to train. One of the important skills a PDI must know is how to source business if they qualify to be an ADI. We would recommend that you make this a priority early on so that your PDI has a pupil for the Part 3. It is all about planning.

**Will the new mark sheet be exactly the same?**

Yes, the form will mirror the SC1 with a few administrative differences. We will capture the following after the initial identification checks;

- Logbook used?
- Trainer/ORDIT PRN?

- Test accompanied?
- Whether trainer listened to debrief?

### **How long after I qualify will I have another standards check?**

It depends on the grade achieved during the Part 3. However the Registrar can and will call a newly qualified (or experienced ADI) for an earlier Standards Check should we have intelligence of poor performance or mal practice.

### **Can I use any type of lesson?**

The choice of lesson is down to the PDI but should be client centred linked. In other words: appropriately pitched to meet the needs of the pupil. It would be unwise to deliver any of the lessons listed below because you would struggle as an ADI or PDI to evidence competency in all 17 sub-competencies. I would suggest you study the Standard Operating Procedure for ADI Examiners which is available on DVSA net. This doc defines each of the sub competencies.

- a controls lesson
- an assessment lesson
- conduct a mock test

### **My trainer says some pupils can only concentrate for about 40 minutes; will I be able to do a 40-minute lesson & spend the remaining time with visual aids?**

Yes, but you wouldn't achieve a positive outcome on a Standards Check or Part 3. The lesson can be in micro sessions if there is evidence that a different teaching technique is needed for the pupil. However the lesson overall must last about an hour.

### **Can I charge for the lesson?**

Yes if you are on a trainee license.

If the examiner fails to attend; will my pupil and I be able to reclaim any costs incurred? As it is currently, the DVSA will consider any out of pocket expenses if we fail to provide the service.

### **Can I use a car that has?**

- Automatic transmission? Yes
- Hill start assist? Yes
- Has been described as a convertible like a BMW Mini as there are no H & S issues for examiners? There is 'no' change to the vehicles that are unacceptable for Standards Check or Driving Test.

### **Will DVSA insist the trainer has his training certificate displayed on the Part 3 test?**

It will be made a condition of ORDIT that trainers display their certificate - they should do so with pride

### **Will the mark sheet be the same?**

The marking sheet will be the same apart from some administrative additions. For example, PDI signature, ORDIT trainer number. The form will also clearly define the difference between a S/C and Part 3.

### **Will there be any change in fees from the existing assessment/will there be any cost implications to the change?**

We have not been led to believe there will be a change to the current fees and, during the consultation process, an economic impact assessment will have been carried out to understand any additional cost implications. We do not anticipate, at this time, that there will be any unnecessary additional cost burden to the individual candidate.

### **What will stop PDI's only learning one subject just for the test purpose?**

The DVSA has said that it is easy to identify a lesson that has been rehearsed. It is also their belief that even though a lesson can be rehearsed; the PDI cannot legislate for the context of the live traffic situation around them as this is constantly changing. A pre-rehearsed lesson cannot cater for the changes in road and traffic conditions.

The DVSA has said that the examiner would terminate either test if the trainer was unable to control risk and there was an obvious concern about safety. Other reasons for a termination could be because of unforeseen circumstances such as mechanical failure or illness etc, but not because of a suspected rehearsed lesson.

### **Can I do a controls lesson?**

You need to consider whether a controls lesson will allow you to demonstrate competence in all 17 areas on the marking form. The straight answer is you won't be able to achieve this as you won't be able to meet a lot of the criteria on the marking form by being stationary.

### **What type of log book or training record should I keep?**

DVSA is also promoting the use of a Trainer/Trainee log book in which trainers and trainees can record subjects covered, different levels of instruction given and overall progress. This will help to make sure trainees obtain the required range of skills, knowledge and understanding to deliver effective training from day one.

The trainee record will become an essential document for instructor trainers and its use will be closely monitored. Most, if not all instructor trainers already record progress like this and DVSA are happy for them to continue to use or adapt their existing processes. The DVSA are not being too prescriptive in terms of what the log book should look like and what format it is in, i.e. paper or electronic. This will be down to the individual training organisations to prepare something that works for them and their learners.