

NASP SURVEY ON PROPOSED ADDITIONAL QUALITY AND PERFORMANCE CRITERIA FOR ADIS

October 2015

EXECUTIVE SUMMARY

Introduction

This report summarises the responses, key findings and recommendations resulting from a national survey of Approved Driving Instructors (ADIs) conducted by the National Associations Strategic Partnership (NASP) from June to September 2015. The survey was created to gather direct feedback from professional driver trainers on a number of measures being considered by the Driving and Vehicle Standards Agency (DVSA) to better monitor and manage ADI quality and performance.

Enclosed in this report is a full summary of the survey data itself, alongside a general synopsis of the key sentiments of respondents to the proposals (including a selection of actual comments made by respondents, representative of the mix of feelings of those surveyed towards the proposals), and culminating in conclusions drawn by the NASP steering group. The final aspects of this report (pages 13 & 14) are NASPs Statement of Principle on this subject and additionally a series of recommendations which NASP would make to DVSA in order to progress the dialogue on this subject more productively.

Background to this survey

Following meetings between NASP and the DVSA earlier this year it has emerged that there is a desire within DVSA to explore the adoption of a data driven approach to targeting ADIs who are (in the eyes of the regulator) performing poorly, and to also allow them to equally highlight areas of high performance. In essence, the regulator is looking at whether using the core data and metrics that they record about ADIs (such as driving test performance) can be combined with other performance indicators, such as the Standards Check, to create a more holistic picture of ADI performance and quality.

A system similar to the Operator Compliance Risk Score (OCRS) which is currently used by the DVSA to decide which vehicles should be inspected was discussed. OCRS is used to calculate the risk of an operator not following the rules on roadworthiness (the condition of its vehicles) and traffic, e.g. drivers' hours, weighing checks. It is more likely that an operator or individual's vehicle will be inspected if their OCRS is high. The proposal tabled by DVSA for ADIs is similar to the OCRS – introducing a "traffic light" system, where once ADIs had been assessed against a number of compliance and risk factors, they would be given a rating with red indicating an ADI

would be monitored more closely, through to green where a “lighter touch” would be employed by the regulator.

Linked to this proposal, NASP has also been requested to give consideration to and suggest potential measurement criteria for an additional quality marque for high performing ADIs (over and above the Standards Check grade alone), that could be useful in publicly promoting excellence in the field of driver training.

The idea has also been linked to the creation of a qualitative assessment of ADI standards and to publishing performance information about individual ADIs via an enhanced version of the Find Your Nearest online function provided by the DVSA.

The prevailing political climate at the time that the proposals were suggested by DVSA meant that very little could happen that requires parliamentary legislation, so any new initiatives would have to be facilitated through policy change and mutual agreement on a voluntary basis.

Key survey information

- **Distribution and communication** - distributed by NASP member associations to their individual members via email, newsletter, individual association websites, industry media and NASP own website
- **Target audience** – members of the four main ADI associations, c. 20,000 ADIs
- **Survey format** - esurvey
- **Survey responses:** 661
- **Duration:** Survey ran from June 30th to 5th September 2015

Caveats

The decision by NASP to publish a report detailing the proposals and reasons for consultation (which survey respondents were urged to read before completing the questionnaire) must be highlighted in this report as this original briefing note also detailed concerns held by NASP on key aspects of the proposals. This could be perceived to have contaminated some survey responses, in that NASP could be deemed to have influenced survey respondents’ views before they completed the survey by expressing such concern. Although respondents are clearly deemed to be more than capable of reading the information provided and forming their own, independent opinions, it is prudent (and good practice in market research) to highlight the possibility of contamination of some responses in this respect and what those influential factors may be.

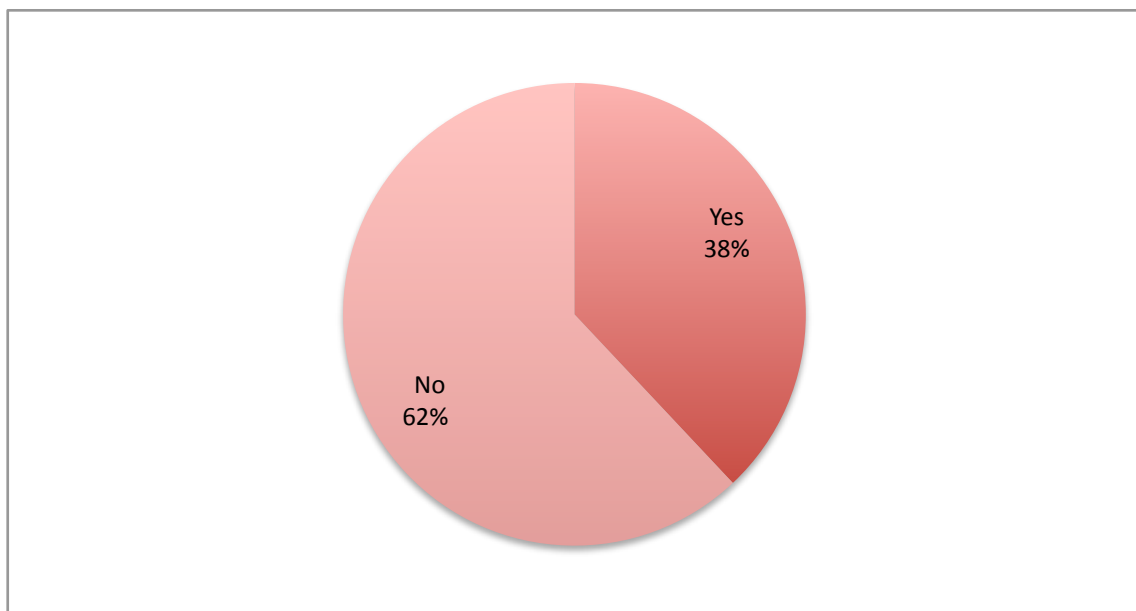
It is also worth considering the influence on responses to such surveys that is inevitable when surveying respondents who will be directly impacted by any change. Historically surveys of other professionals, across other industries, where changes to regulation, professional assessment and performance indicators are mooted do not always have positive results in favour of change. If the proposals focus on increasing regulation of individual practitioners, introducing more performance measures or increasing monitoring of standards, then those respondents have tended to respond

negatively. It could be therefore prudent for DVSA to also consult with other key stakeholders, such as the public customer, for a wider view on these proposals.

Summary of survey responses

Below is a snapshot of the quantitative and qualitative survey data, listing the questions used and the percentage split of responses. As you will see from the total number of respondents to the overall survey, and the total responses to each individual question, not every respondent answered every question.

Q1. In principle, do you feel we need additional performance and assessment criteria for ADIs?



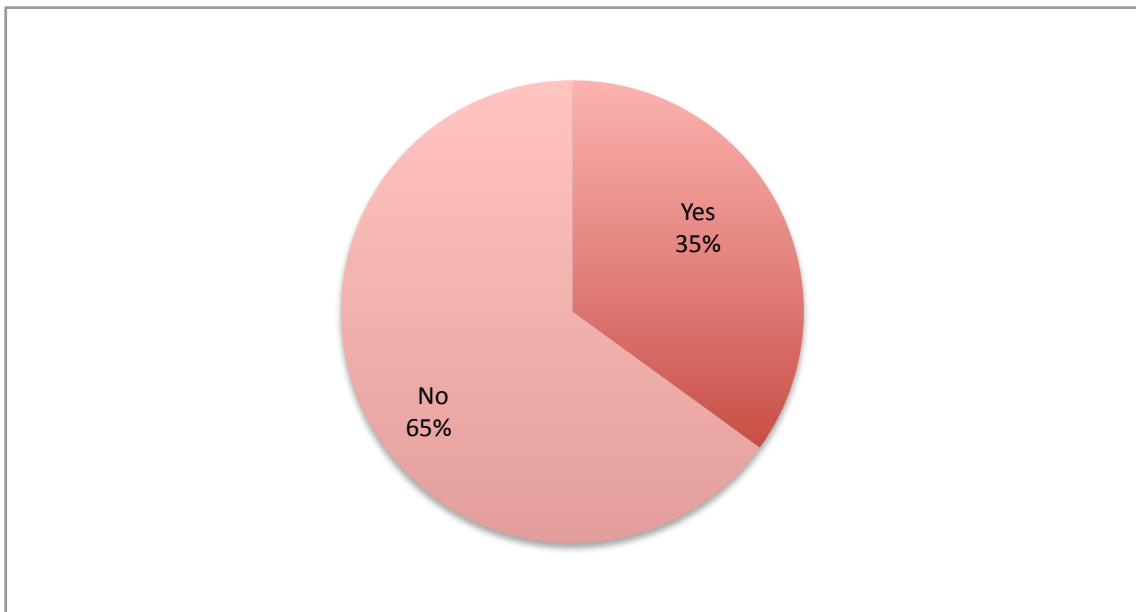
Yes	37.9%	220
No	62.1%	360
Total		580

Reflective comments

- *The current system at the moment does not truly reflect an ADI's quality. Therefore the introduction of additional will be of no further benefit. A complete new outlook is required altogether.*
- *As well as a standards check I would like a driving ability test. If you teach as you drive your driving skills need checking surely?*
- *Currently ADIs have little to differentiate between a an ADI who is at the top of his game compared to the one who is trailing at the bottom of the scrapheap. By providing categorisation based on additional qualifications, CPD attendances and other performance measurements. DVSA would go long way to reward the performers and weed out the rubbish.*

- ADIs are self-employed people, DVSA cannot go around thinking it can treat us as employees who need to demonstrate performance to them in order to keep our livelihood. My customers judge my performance.
- Performance against soft measures should be reported, how that's measures is questionable. Reliability, customer care, and quality of communication way too.
- The standards check should be sufficient. If the DVSA feel they need further assessment perhaps the standards check is not fit for purpose?
- How can a good service be maintained if not continually monitoring it . If we don't, then that opens up for complacency.

Q2. From what you have read of the additional performance criteria proposed by DVSA would you support a traffic light system?

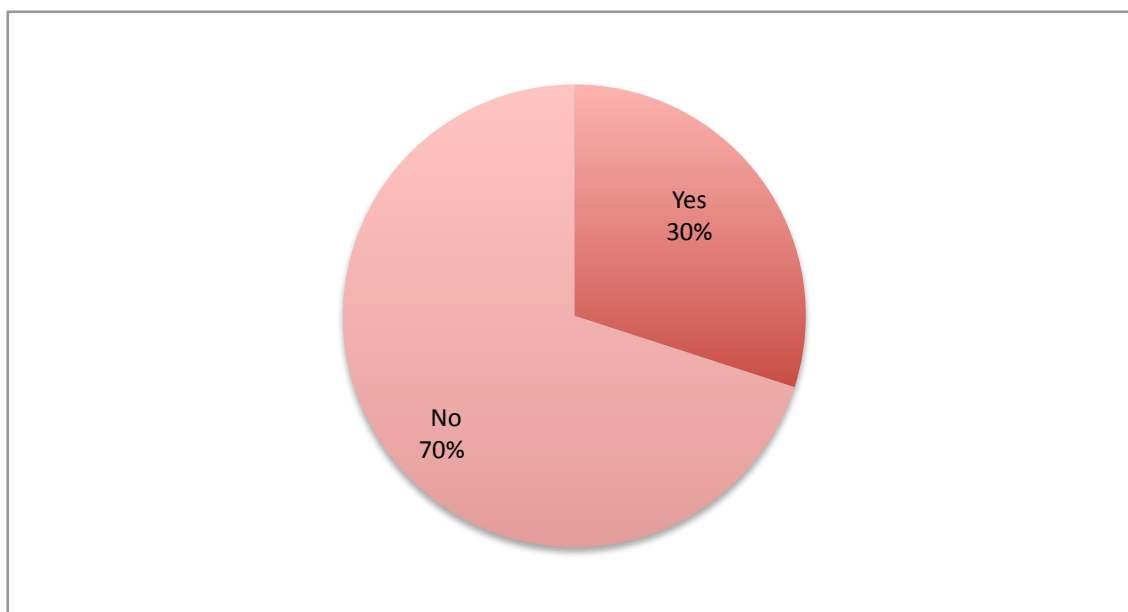


Yes	35.0%	197
No	65.0%	366
Total		563

Reflective comments

- I think this gives a good indication to DVSA to target under-performance
- I work for myself not DVSA. I'm not taking part in any dvsa colour scheme
- I would need to further read additional performance criteria before making any comment
- I'd prefer a rating system e.g. 1 to 10
- If it was also based on experience and qualification
- If the criteria and information could be proved to be a true reflection on the ADI's ability
- I work for myself not DVSA. I'm not taking part in any DVSA colour scheme
- Giving an instructor warning of their performance gives them room to improve
- If used internally to help determine frequency of standards checks then this seems reasonable.
- This is a very blunt instrument. To find out how good ADIs really are ask their pupils.

Q3. Would you consider it acceptable that DVSA uses data derived from driving test performance (i.e. pass and failure rates) as part of the overall performance and quality assessment of an ADI?

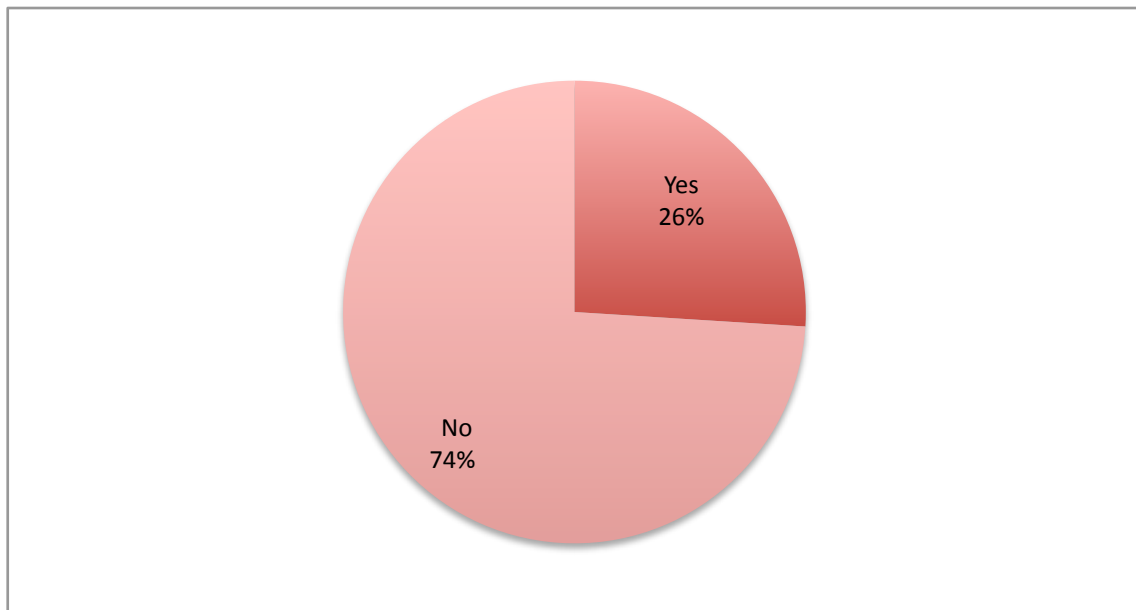


Yes	30.1%	173
No	69.9%	401
Total		574

Reflective comments

- *ADI's working exclusively in a classroom environment have no Driving Test results.*
- *An ADI can not really be held responsible for the outcome of any test.*
- *Fair enough, if we train to a high standard then we will have a good pass rate.*
- *For DVSA internal use and for discussion with ADI at standards check*
- *How can an ADI be held accountable for a pupil doing something silly on test due to nerves*
- *I don't teach learners, so how will it assess me? Would they also take the information for Part 2 and 3?*
- *Yes, your client is a reflection on how you've taught them*
- *NO as many of my candidates have learning disabilities and lack of self confidence it often takes a few tests for them to get comfortable with someone strange next to them and that they are being assessed. This leads to poor results compared to how I know their performance. Any figures used from my learner drivers would heavily influence my Stats compared to my B+E stats where drivers are socially comfortable.*
- *Even the most well trained and well prepared learner can make a silly mistake and require the examiner to intervene, which could potentially go against the instructor, but then a poorly prepared learner could get a lucky test route with no challenges and pass, making the instructor seem good when there could be huge gaps in the knowledge they are passing on.*

Q4. Based on the proposed traffic light style system, potentially creating a risk rating score for each ADI as a measure of performance or quality, would you be happy for that score to be published?

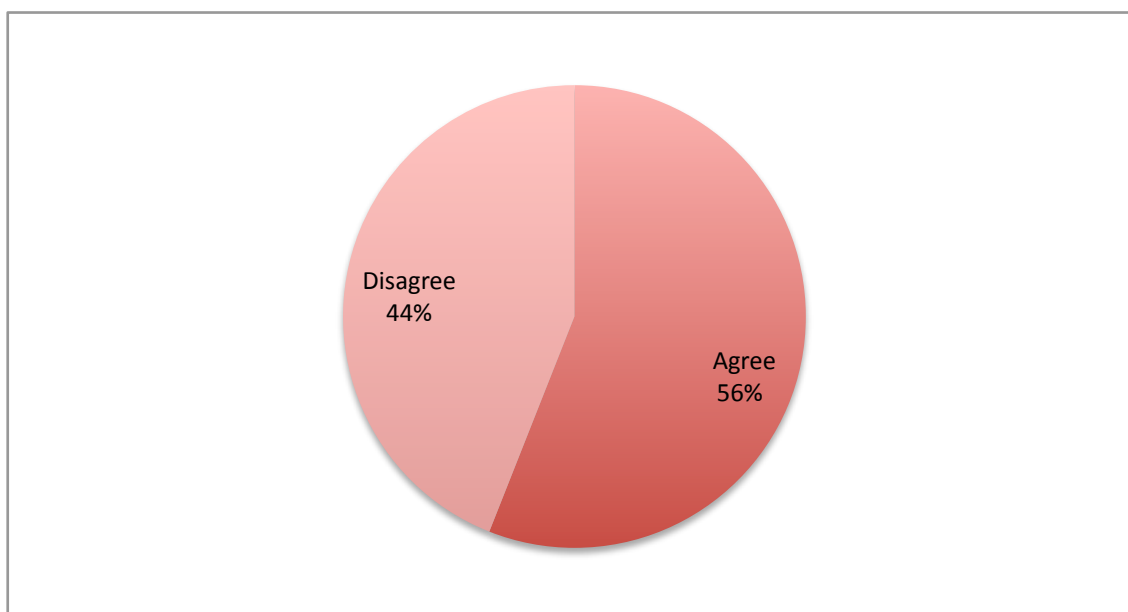


Yes	26.3%	150
No	73.7%	421
Total		571

Reflective comments

- ADIs should have nothing to hide
- As long as an explanation of what it actually means and as long as it wasn't test focused.
- As long as it is a fair, true and accurate measure.
- I'll start taking my badge out to stop them
- If based on test results it would appear as though I was incompetent!
- If having a bad run you're ruining our businesses by highlighting it to others
- It will only make finding pupils harder, based on results from a test for our pupils that we have no control over? Also, if we are to be graded on our pupils ability to take the driving test, then surely we should be able to have our input as to the pupils performance on test! This is not allowed at this time! We are gagged as to making any sort of comment on the test just taken!
- I do not think the DVSA is supportive to ADIs or even objectively neutral, so this would be a disaster.
- No, for reasons mentioned. Prospective customers need to be informed what they are getting into. Don't put them off until they have had opportunity to find out. As mentioned, your criteria needs to be far wider to have any meaning.
- Not sure as the risk rating score would not reflect the pass rate of the region that the instructor is working in
- But only if the system takes into account and corrects any bias against ADI's who are not involved in the learner driver delivery.
- We don't live in a black or white world. This could be seen as a poor instruction. Stats don't work as they can be manipulated too easily.

Q5. As part of monitoring quality and as a performance management action, DVSA is also looking at ways of dealing with ADIs who fail to display their badge on test. Do you agree ADIs should be penalised for not displaying a badge on test?



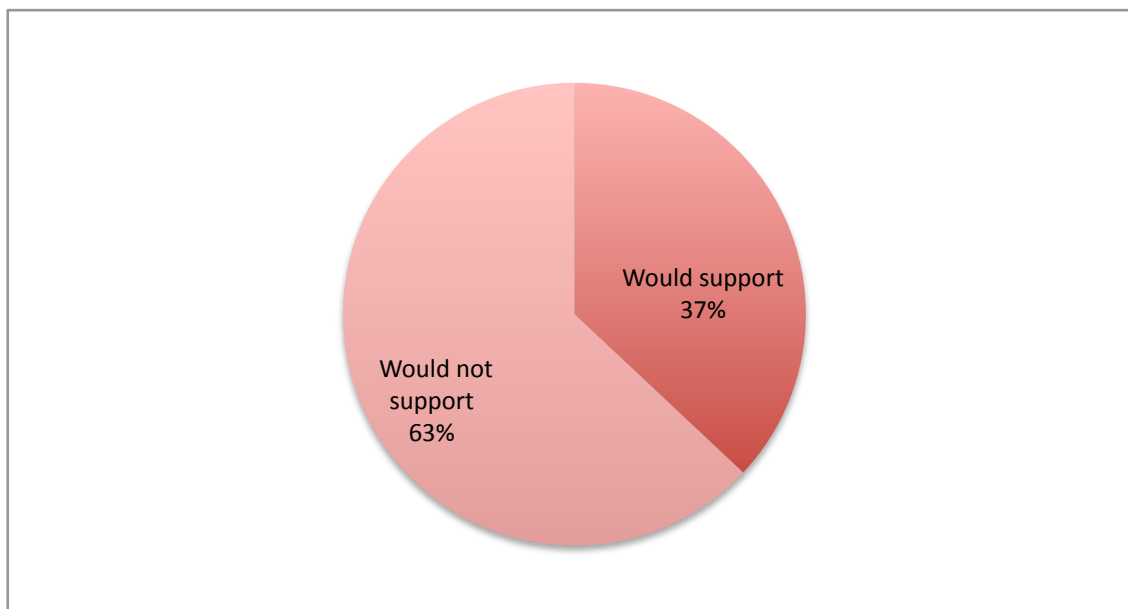
Value	Percent	Count
Agree	56.3%	322
Disagree	43.7%	250
Total		572

Reflective Comments

- *I think they should be more responsible for the standard of students they are taking to test.*
- *I worked hard for mine, It's always on show*
- *If a pupil is not ready for the test the ADI should not be allowing them to use their car*
- *If an ADI is doing his/her job properly and professionally, what is there to hide?*
- *If they are not displaying badge then they don't think the pupil should have been there .*
- *If you're going to monitor on test data it'll be essential*
- *It is a commercial world if a customer wants to present themselves for test it is their choice.*
- *Since when was it a requirement to display a badge when not teaching?*
- *Some of my pupils elect to take their own car and mum/dad to test. Should I lend them my badge?*
- *As it is a requirement of holding the right to the 'licence' I feel those who choose to contravene the terms could expect to be penalised. A driving test is still your responsibility for your pupil, your business, and reputation!!*
- *This presumes the learner will have spent the majority of their time with the ADI taking them for test. It does not take into account the practicalities of a multi ADI business nor does it allow for potential poor practice by some who would pass their poorer pupils over to a more junior ADI to take the result for them.*
- *What do you mean by penalised ? This is FAR too vague a term for it to be in any way meaningful when asking this question. You must be much more specific and say what you*

actually mean by this.

Q6. Would you be supportive of a move by DVSA, alongside targeting and tackling poor performing ADIs, which also creates an 'elite' ADI status (based on some of the criteria outlined in our report) that is over and above the Standards Check?



Value	Percent	Count
Would support	37.0%	211
Would not support	63.1%	360
Total		571

Reflective Comments

- *As long as it was done in a constructive, supportive manner rather than a punitive one.*
- *Ask the examiners they already know which are the bad and good instructors.*
- *Bring back the Fleet Standards check please, lets separate the learner ADI from the Fleet ADI.*
- *But not by car test results which can be influenced by examiners bearing a grudge.*
- *Current grading should be sufficient or are the DVSA now saying its not fit for purpose?*
- *Depends on what tackling means if it means additional training and help*
- *DVSA should try to help ADI'S more and not create an elite group this would make things worse*
- *Either the Standards Check is valid or it is not. If it is not then why do it?*
- *Elite ADI's? Tackle the problem of poor examiners first.*
- *Elite means there is nowhere to improve. We all need to improve otherwise we get stale.*
- *Grades are, and have always been a waste of time*
- *I agree with the NASP concerns in this matter*
- *I am already a super ADI, having taken the DIA course*
- *I am already an elite ADI according to my customers*
- *I am currently grade 6 which on the last survey put me in the top 5-6% of ADIs. Since the advent of the Standards Check and very unpredictable and unreliable assessments made by examiners, this much vaunted A grade has produced an 'elite' of around 26%. I an totally in favour of the new assessment criteria however most examiners do not seem to understand it*

and assess on the old instructor led system.

- *I wouldn't trust the DVSA. Industry acceptance to a range of qualifications (such as BTEC or DIPDI) would be better.*
- *Wasn't this considered and discussed during the development of the recently introduced Standards Check? We all know that, like most of the public sector, the DVSA is definitely inefficient and often ineffective but they need to face the music and admit their incompetence in introducing what they evidently see to be a Standards Check which isn't fit for purpose and the Registrar and Chief Examiner need to take responsibility for this and messing about with instructors livelihoods and be summarily dismissed for gross misconduct. Otherwise they should stand by the Standards Check and leave it for several more years to bed in and until the facts are known as to its effectiveness*

Q7. What additional suggestions do you have for managing ADI performance and promoting quality within the profession?

- *A CPD system that is specific and works*
- *A fairer ADI monitoring of experience and performance of individuals*
- *A more structured mandatory CPD criteria with qualification path ways for PDIs and adis*
- *A requirement to provide proof of quality CPD.*
- *Annual quality check*
- *As a Ordit trainer I think any changes need to start with who can teach Pdis*
- *DVSA improve their own standards. DVSA stop badgering the ADI industry*
- *Disband the DVSA and let the ADI organisations sort out a professional governing body.*
- *Pupil feedback forms Examiner feedback. Instructor feedback on themselves.*
- *Pupils progress reports should be submitted to examiners to view before test*
- *Not sure how feasible, but monitoring candidates' driving performance post-test and linking to ADI's would be interesting. Such things as penalty points and crash involvement.*
- *Pupil questionnaires specifically tailored to extracting information about their instructors approach to teaching. Direct DVSA led CPD.*
- *An automatic customer satisfaction survey to get feedback direct from every pupil. This would be easily achieved on line.*
- *It is high time to name and shame those ADIs who take money under false pretences and never deliver the goods.*
- *A mystery pupil would be able to check how the ADI performs when not being tested along with the normal standards check*
- *ADIs must take regular training that is recorded for anyone to check their progress*
- *I'd like to see the standards check carried out more often - every year would be great! As with driving, the problem is that once passed, many of us don't review our operating practices - until we get that letter through the door and THEN we smarten up. I think a more regular standards check is the way forward*
- *The idea of a risk rating score is fundamentally wrong. All ADIs have been approved by the DVSA and thus should not present any risk to the public. If they do then the DVSA's criteria for registering ADIs should be examined. ADIs should be assessed by a range of criteria similar to that proposed a grading similar to OFSTED should be used. No ADI should be barred solely on the criteria of a standards check that bears little resemblance to their ongoing performance and evidence of their ability to successfully teach their pupils as evidenced by pass rates and measures of customer satisfaction. The standards check is not reflective of the real world where for example most lessons are of 2 hours duration and many driving schools only offer 2 hour lessons. ADIs should be assessed on their normal lesson duration. The Standards check is an artificial pressurised situation that imposes an abnormal situation of stress and pressure that is not normally present in the normal course of providing tuition. ADIs who may be brilliant at teaching but not well equipped to cope with this stressful situation can be adversely graded by this system. Pass rate is a much better measure of the ability of instructors as it provides a measure of performance based on a realistic measure over a sustained period of time.*

Key findings

- The majority of respondents (just under two thirds) are not in favour of additional performance criteria for ADIs
- The majority of respondents would not support the introduction of a traffic light system
- The majority of respondents would not consider it acceptable for DVSA to use driving test data as part of overall performance and quality assessment
- The majority of respondents would not be happy for their risk rating score to be published
- Opinion was relatively divided on the issue of penalising ADIs who fail to display their badge with just over half in favour of penalties and just under half of all respondents against
- The majority of respondents would not be supportive of the creation of an 'elite' ADI status
- A high number of respondents feel that rather than adding on additional performance measurements to the existing Standards Check that the entry criteria, ADI qualification process and Standards Check collectively should be improved so they are fit for purpose
- Many also feel that focusing on committing ADIs to undertaking more regular and quality CPD would be a better focus than other additional measures suggested

NASP Concerns

NASP has already expressed significant reservations regarding some of the outline proposals, in particular the source of statistics gathered relating to individual ADIs and the way in which they could be used to determine a risk score or publicly available quality status. These concerns are mostly focused around the proposed use of test data, such as pass rates, severity of faults recorded, examiner intervention frequency and display of ADI badge on test. NASP would suggest that if an ADI is going to be risk assessed and monitored outside the existing regulatory requirement of a Standards Check, it should be through channels that are more directly attributable to the ADI, than those heavily impacted by third parties i.e. pupil's or examiner's actions on a driving test. NASP fully supports action being taken by the Regulator against any ADIs who are in breach of ADI regulations – as we would equally support any robust, quantifiable and balanced measures which serve to better highlight the quality and professionalism of regulated driver trainers to the public and better inform their choices. However, NASP has misgivings that the methods outlined above are an appropriate and justifiable way to identify any low ADI standards, equally questioning whether they are a truly fair and effective way of monitoring or identifying high standards.

NASP is keen to seek ways to promote the skills, expertise and professionalism of the UK Driver Training Industry, and is committed to the continuation of this process. However, there are aspects of the potential initiatives detailed within this document that NASP, as representatives of the Driver Training Industry, have clear concerns and reservations with, and we wish to take this early opportunity to make this clear to all of our stakeholders.

We will, however, continue to consult closely with our memberships on this issue so we are able to feedback to DVSA with the views of the wider ADI community as DVSA further shape any proposals.

NASP Statement of Principle

Having considered the responses from this survey, and in conclusion, NASP makes the following statement of principle regarding the proposals:

- I. NASP would support IN PRINCIPLE the idea of a traffic light system for ADIs, but only where the data that is used, and it is based on, is directly attributable to the individual ADI's performance
- II. NASP would not support the general publication of a risk score, or the individual components attributable to the "traffic light" status, unless the individual ADI has given express permission to do so. We consider that either an ADI is a "fit and proper" person and acceptable to the DVSA or is not, and if not then should be removed by the Registrar.
- III. NASP would not support the use by DVSA of any data collected from driving tests being used as a method of monitoring ADI performance where this would lead to the targeting ADIs for remedial action. The statistics collected have too many variables, are subjective, can only be directly attributable to a test candidate and/or an examiner, and the level of inconsistency of the driving test regime across the country does not allow the figures to give an accurate, fair or justifiable assessment of an individual ADI's performance.
- IV. NASP would request that any initiative to penalise any individual ADI for not displaying their badge on a driving test would only be implemented if the display of said badge becomes a legally enforceable requirement, having undergone the due diligence of the regulatory process to become law through parliamentary legislation.
- V. NASP maintains that, if used, such specific focus on driving test statistics as a benchmark for ADI performance pushes the industry and the public even further towards a "test centric" approach to driver education, which moves against the flow of the respected road safety research of recent years which has encouraged **teaching** post test coping strategies and the higher levels of the GDE matrix. (E.g. HERMES, MERIT1).

NASP Recommendations

NASP would recommend to DVSA the following actions and considerations in order to progress consultation on this subject more productively:

- **Broader consultation with other stakeholder groups to produce a wider view to identify and validate if there is a public desire for the basis of the DVSA proposals (i.e. pupils and other external customers)**
- **Taking into consideration the above feedback, to provide greater clarity and detail of the performance criteria, earned recognition scheme and the mechanisms for implementation, shaping the proposals further and then consulting again with key stakeholders on any revised proposals so respondents are able to take a more informed view**
- **Consider other pragmatic suggestions made by respondents to the survey about making the Standards Check, entry criteria and qualifications process more effective in managing out poor performers (rather than adding more layers and processes)**
- **Explore how we can make CPD more effective as a tool to improve performance and standards and something which all trainers engage in.**
- **Re-evaluate the relationships between Driver Training Stakeholders and DVSA and how we jointly communicate with the general public on issues such as ADI quality and quality benchmarks, whilst maintaining robust and fair methods of ADI performance measurement and regulation.**