

NASP Questions to DVSA 24.8.2021

1. Does this mean if we don't flag any of the triggers ADIs will have no standards check at all or will there still be one every four years?
2. How can DVSA be gathering information correctly when they aren't conducting complete tests for the full time? The driver faults will be incorrect. How can this be implemented until DVSA are conducting full tests again?
3. Currently there is no definitive time for the length of a driving test because it can be terminated as soon as a serious/dangerous fault, or totting up of faults, and yet the 5 descriptors are collated on a test being 38 - 40 minutes long. Unless all the descriptor information is collected over tests of a standard time then there is discrimination being placed against those records where a student does a full, 38 minute test. They are not brought back early, and therefore are predisposed to create more faults for the journal to record. However, a candidate who is presented and is terminated by the examiner after only 5 minutes, has no opportunity to the exposure that the previous candidate had, and so the ADI that brings the poorer prepared student is being rewarded?
4. DVSA state we can call for a standards check, where we have to give a reason for why one is required, what reasons will be accepted?
5. Exactly when do these changes start? What dates are being used for the data collection?
6. This system only works when the instructor's badge is displayed during test. Surely therefore it should become mandatory to display the badge, otherwise an instructor is deliberately manipulating the figures upon which they will be based?
7. Can we receive copies of ALL tests reports for any candidate we take to test? We do not always see this since its gone digital. If we are now being monitored on this, then surely we should have access to the same information 1st hand not via the pupil?
8. Do the DVSA realise the pressure we are under to take pupils to test, who are borderline, they won't defer their test as there are none available?
9. We have often been told it is not our test, but the pupils, but now apparently it is. Whose test is it?
10. If the pass criteria (as set by legislation is 15 or less DFs) then why are we targeted at 5 driver faults, can you explain please?
11. Does this mean that someone could be called for a SC every few months (if it's done on a rolling 12 month average)? At the moment with no further information from the DVSA, theoretically an ADI could be asked to book the next SC the day after the first one.
12. Will the cost of our certificate change? As we currently all pay for 1 SC per 4 years, will we have to pay for the extra tests (if needed) & get a reduction if not taking any SCs?
13. Challenging pupils with any kind of learning disabilities could find it hard to find instructors to teach and take them to test. How keen would instructors be to take them? Wont this lead to discrimination?
14. When we used to be sent our test stats annually, it was common to hear instructors say they were inaccurate, is the system being used reliable? If so could the DVSA explain to ADIs how the figures are collated to allay their fears.

15. What is the current number of "enforcement officers" that are going to deal with this workload? Are these enforcement officers able to mobilise around the country to where the problems are or will they only target those ADIs that are within their local travel to work area and hence potentially miss some of the "worst offenders"? Are there enough enforcement officers to make the engagement calls for 30 minutes each one?
16. If the ADI explain on the engagement call the reasons behind the test fails such as a pupil with learning difficulties will the SC then not go ahead if the reasons are well given?
17. Can DVSA confirm this only applies to ETA/P and not ETA/V? Or is it both?
18. Can DVSA clarify whether using ADI personal information is fully compliant with GDPR, and if so, on what basis? The assertion here is very much that the test is the candidates test and not the instructors.
19. Have DVSA considered the opportunity for ADI Examiners to have a conversation with ADI's who are close to triggering the required criteria before such time as they may actually trigger the criteria. This encourages better partnership working and gives ADI's an early opportunity to address any particular issues or make relevant representations as to what may have seen a recent downturn in their pupils (candidates) test performance.
20. Will female instructors, who may bring more female candidates to test have any discretion given the percentage of test passes for females is around 43% yet for males is around 50%.
21. The pass rate has been set at 55%. There has been previous mention that this will be assessed on a local basis, however this is not what has been published. Will local data be used, and will this be made available, in real time or will it be 55% nationally (the pass rate nationally is consistent at around 46%)?
22. Test centres have varying pass rates themselves, should the pass rate to be a trigger be less than the percentage for the main test centre used by the ADI?
23. Will a Grade B instructor who consistently delivers high quality pupils to test will automatically be "promoted" to a Grade A? A grade A who is underperforming will clearly be called to a SC.
24. As instructors in general now have no access to the test report as it goes straight to the candidate (in most cases) and they are not allowed to sit in on tests, instructors have a real challenge about faults recorded how does DVSA intend to address this gap in data for instructors?
25. What role does being a Grade A or B play? Conceivably an A could fall foul of the triggers and an B might not. The new system also favours those instructors for whom the primary goal is to teach to pass the test, and to focus on not making faults, rather than taking a broader view of preparing learners to drive in environments that they might not encountered on test and to think beyond it; does this imply that instructors who previously received an A grading are now more likely to be called for a SC over those who might have been given a lower rating.
26. Some ADIs have received their crystal report recently and it is for 24 months. The DVSA website states its over 12 months so why is this as there is no explanation?
27. I book my client's tests on the OBS and use my ADI number. If I then refuse to take someone who is not ready, and they go in a private car and fail, is that test still attributed to me? Or is it only taken if badge is displayed? I have heard conflicting information on this so would like clarification please.