



Department
for Transport



Driver & Vehicle
Standards
Agency

Modernising Compulsory Basic Training Courses for Motorcyclists

A RESPONSE TO CONSULTATION REPORT



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**MODERNISING COMPULSORY BASIC TRAINING COURSES FOR
MOTORCYCLISTS**

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MODERNISING COMPULSORY BASIC TRAINING COURSES FOR MOTORCYCLISTS

REPORT ON PUBLIC CONSULTATION

EXECUTIVE SUMMARY

1. This paper reports the outcome of the Driver and Vehicle Standards Agency's (DVSA) consultation exercise about modernising compulsory basic training courses (CBT) for motorcyclists. The consultation was held between 10 March and 21 April 2015.
2. The DVSA Business Plan for 2014/15 committed to 'improving the safety of young motorcycle riders by reviewing the compulsory basic training'.
3. The aim of the consultation was to seek views to improve standards within the rider training industry and ensure learners receive training that is tailored to their individual learning needs and better prepares them for riding on public roads.
4. The consultation also sought views about the process by which trainers qualify and proposed changes to the arrangements to quality assure trainers and training bodies.
5. When CBT is tailored to suit the trainee's learning needs, it provides learner riders with the basic skills they need to prepare them to ride unaccompanied on the road more effectively than CBT courses that do not adopt this approach. We are encouraged by the responses from trainers that many of them already recognise and deliver a client centred approach to training. Many trainers already discuss with trainees the extent of their theory knowledge and riding experience before the course starts. These trainers have ensured the trainee knows what to expect during the course and that a CBT certificate will only be issued when they have demonstrated the appropriate competence, which might mean returning for further training.
6. DVSA aims to ensure this approach to training is implemented by all of the industry, recognising those trainers who do so and helping other trainers to achieve the same exemplar standards of training.
7. The changes to the standards check will identify those trainers who persist in a 'one size fits all' approach to training, we believe these trainers are more likely to issue the CBT certificate because a trainee has completed the required elements of the course rather than ensuring they have developed the knowledge, understanding and competency to ride unsupervised. Those trainers we suspect are failing to comply with regulations or delivering poor training will be targeted with unannounced visits.
8. We recognise changing the culture that CBT is a one day course which guarantees a pass and certificate at the end of the day will not happen overnight. However, we believe that by improving the information available to trainees to ensure they are better informed about what to expect from a CBT

course, will enable them to choose a trainer who can ensure they are fully prepared to ride independently. We hope this will encourage them to proceed to full licence acquisition and a continuous lifelong learning approach to their motorcycling.

INTRODUCTION

8. On 10 March 2015, DVSA published a Consultation Paper:
9. To promote the consultation, we:
 - wrote to key motoring stakeholders,
 - promoted the consultation on the Government website,
 - sent e-mail alerts to those trainers who have signed up to receive them.
10. The consultation was conducted online. The closing date for responding was 21 April 2015.

RESPONSES TO THE CONSULTATION EXERCISE

11. There were 327 responses to the online consultation. In addition, we received 23 emails, responding fully or providing other comments. Those responding included: motorcycle trainers, Approved Training Body (ATB) authority holders, motorcyclists – CBT holders and fully licenced, motorcycle training industry interests and road safety interests.

SUMMARY OF VIEWS

13. We asked a series of questions about aligning compulsory basic training with the National Standard for Driver and Rider Training, tailoring training to suit the needs of the individual trainee and developing training materials that support and encourage that approach. The responses were strongly supportive of these proposals.
14. Responses to the questions about raising public awareness about CBT and ensuring trainees had the right level of theoretical knowledge and had demonstrated competence to ride independently indicate that DVSA and trainers need to tackle the widely held perception that CBT is a 'one day course'. Candidates need to understand a CBT certificate will only be issued if they have demonstrated that competence. Some trainers may need to feel confident of DVSA's support if they do not continue with a training course because the trainee does not have the appropriate level of theoretical knowledge or to inform the trainee that more practical training is needed before they can be issued with a CBT certificate.
15. Responses to the questions about the standards check for motorcycle trainers agreed that changes to the standards checks to support a risk based approach to quality assurance were a good idea. There was also agreement that the qualification process needs to change. There was support for an additional assessment for trainers who want to 'down train' other trainers and for making the assessment available from locations other than DVSA's training academy at Cardington.

16. Although the consultation did not include questions about the frequency or other arrangements to conduct standards checks, there was also support for DVSA to conduct unannounced standards checks (also referred to by respondents as 'mystery shopper' visits or spot checks).
17. Some respondents called for further regulation:
- requiring the trainee to have successfully completed a motorcycle theory test before undertaking CBT
 - limiting 'down trained' trainers to two years before requiring them to undergo the instructor assessment
 - legislating to increase the current 2 hours minimum period of the on-road ride
 - legislating to require CBT to be conducted over two days.
18. We plan to adopt a phased approach to introducing the required changes; we will firstly introduce changes which do not require legislation to be amended and will subsequently consider amending regulations where there is a strong case to do so.

DVSA RESPONSE AND DECISIONS TAKEN

Developing training materials and raising public knowledge about CBT. Ensuring trainees have the correct theoretical knowledge and have demonstrated their competence to ride independently before they are issued a CBT certificate.

19. DVSA will ask the training industry to work with us to develop new training materials that can be accessed on line. We will explore how learning materials to improve riders' knowledge and understanding of theory and the Highway Code can be developed and made widely available.
20. Although there was strong support to legislate to require CBT trainees to pass the full theory test before starting the course we do not intend to amend regulations to provide for this. CBT is intended to allow a provisional licence holder to ride unaccompanied on the road and we maintain it should be considered as preparation for a rider to undertake a test, rather than as an end in itself. In addition, as the theory test certificate held by a rider taking the module 1 practical test links to the module 2 test¹ there is the likelihood that a rider would incur more expense to obtain a full motorcycle licence. Many respondents took the opportunity of this consultation to express concerns about the current expense of obtaining entitlement by progressive testing and the risks of unlicensed riding if costs were to increase.
21. Trainers have expressed concerns that many young trainees attend a CBT course with very limited theoretical knowledge. DVSA needs to ensure trainees understand that a trainer will either not proceed with the course until the trainee can demonstrate that knowledge or will extend the training until they are able to.

¹ A rider presenting for module 2 practical motorcycle test must present to the examiner both a valid theory test pass certificate and a module 1 test pass certificate. The theory test certificate must bear the same serial number as the one evidenced on the module 1 pass certificate.

22. We recognise that there is potentially a business and economic consequence for trainers who decide it is not appropriate to continue with the course. DVSA will publish strong messages aimed at trainees, to the effect that we endorse this position and are taking action to ensure trainers comply with their responsibility to only issue CBT certificates to those trainees who have demonstrated the appropriate standards of competence and who have the required level of knowledge and understanding of riding theory.
23. We will encourage and support trainers to consider a comprehensive modular approach to theory knowledge tailored for inexperienced road users, which could perhaps be delivered before undertaking CBT in a classroom situation, or as part of the CBT course. We expect that this approach will ensure trainees are properly prepared to fully understand the matters set out in Element D² of the CBT course.
24. DVSA, wants to change the perception that CBT is a one day course, and many of the responses from trainers also agree this needs to happen. DVSA appreciates that this delivery method has traditionally been seen as a cost effective business model however there is little scope for trainees to return for additional training if required, so they reach the acceptable competent standard. This has encouraged the expectation that a CBT certificate will be issued at the end of the day.
25. We would like trainers to consider other ways of delivering CBT, for instance:
Saturday am Group 1 undertakes modules A – D Saturday pm Group 2 undertakes modules A – D
Sunday am Group 1 refresh session and then undertake module E Sunday pm Group 2 refresh session and then undertake module E
The same numbers of trainees undertake CBT but are better physically and mentally able to cope with the on-road ride. We anticipate this will address concerns about trainees becoming tired or losing concentration towards the end of the on road ride and ensure that trainers fulfil their responsibility to assess that trainees have made the right amount of progress to be considered competent to ride unaccompanied. We would be interested to hear from trainers who deliver CBT by other 'non-traditional' formats.
26. There was a significant amount of support for introducing an independent riding assessment, similar to that which test candidates must undertake. There is a difference between “being able to ride independently” and “independent riding”. The former indicates the trainee is able to make basic decisions for themselves and can demonstrate they need little, if any, intervention from their trainer (other than to follow directions) to ride safely. Independent riding is a part of the motorcycle practical test whereby test candidates are tested on their ability to think, plan and ride without intervention or direction from their examiner, typically whilst following directional road signs.
27. DVSA believes being able to ride independently is setting the appropriate level of competence for CBT. Many trainers assess competence by reducing the amount of direct instruction given during the on-road ride. Riders who continue to require continuous instruction about steering and braking inputs,

² Element D of Schedule 12 of the Motor Vehicles (Driving Licences) Regulations 1999
<http://www.legislation.gov.uk/ukxi/1999/2864/schedule/12/made>

appropriate gears, and speed etc clearly have not demonstrated competence to ride independently and should not be issued with a CBT certificate. This will be addressed in DVSA's plans to improve public knowledge about CBT.

28. DVSA publish *The Official DVSA guide to Riding – the essential skills*³ and *the Official DVSA guide to Learning to Ride*, these publications provide comprehensive advice and information about motorcycling. However DVSA acknowledges that the information about CBT which is available on GOV.UK does not provide in depth information to inform the trainee what to expect during the course. DVSA will improve online website content to provide more comprehensive and accessible information that a learner needs to know about CBT. This will include:

- reinforcing the messages that CBT is not a one day course
- creating an expectation amongst trainees that their trainer will fully inform them about the theoretical knowledge they need; what to expect during the course and that the on-road ride is a *minimum* two hours
- DVSA expects that trainers will not continue with a course if a trainee does not have sufficient theoretical knowledge
- trainers may decide that, because the two hours on-road ride is a minimum requirement, the trainee needs further practical training to ensure they are competent before a certificate will be issued. DVSA expects trainers to only issue certificates to competent trainees
- the information DVSA needs in order to investigate allegations of non-compliance
- video clips showing the CBT elements
- links to the Safe Driving for Life and *Think!* websites and Facebook pages
- information about suitable protective clothing
- how to obtain the right theoretical knowledge and links to training materials
- information for riders with disabilities and their trainers about adapted motorcycles

Certified instructor qualification process and revisions to the standards check

29. The consultation paper set out proposals to revise the qualification process for trainers. We proposed to:

- Combine the CBT and DAS trainer qualification assessment into a half or one day assessment that could also form part of arrangements to enable progressive training
- Introduce a separate means of qualifying as a down-training trainer.

30. The responses were very encouraging 63% agreed that there should be a separate assessment to down-train other trainers.

31. Whilst our initial understanding was that this might be possible under the current regulations⁴, after further scrutiny of the legislation we have established this is not possible. We would need to amend the regulations to implement these proposals, therefore, this will now form part of our longer term considerations.

32. The consultation paper set out the revisions to the standards check which will now focus on *how* training is delivered rather than current arrangements

³ <https://www.safedrivingforlife.info/shop/motorbike/cbt>

⁴ Part V of the Motor Vehicles (Driving Licences) Regulations 1999

which simply confirm that a particular skill or element was delivered. DVSA intends that the changes to refocus the check on the quality of training will support a risk based approach to quality assurance. This approach⁵ will provide more accurate feedback to the trainer as well as focussing on three core trainer competencies of lesson planning, risk management and teaching and learning strategies in line with the National Rider Trainer Standard.

33. DVSA will also have regard to how CBT delivery models are tailored flexibly to the trainees' different needs, how trainers check theory knowledge etc. This will contribute to DVSA's plans to recognise those trainers who consistently meet or exceed those standards with 'earned recognition status'
34. We intend to develop earned recognition in conjunction with the training industry for those ATBs and trainers who consistently deliver a quality training service and training standards. In addition to recognising those schools on GOV.UK and potentially reducing the volume of standards checks which good trainers are requested to attend we will explore other options for recognising those training schools that provide the best training
35. Trainers will have the opportunity to ask questions about the revisions to the standards check before they are introduced. The DVSA motorcycle team will deliver a series of presentations to trainers to ensure they are fully informed about how the revised standards check will be conducted and to discuss the other proposals.
36. DVSA will continue to encourage trainers to acquire additional instruction and coaching qualifications and to undertake continuous professional development to maintain and update their skills. However, we do not intend to mandate any specific qualifications as a pre-requisite for 'earned recognition' status, as we realise that could put smaller ATBs or single trainer businesses at a disadvantage. The point has been made in the responses that lacking a particular qualification does not necessarily mean poor instructional ability. In addition, an advanced riding qualification does not equate to a coaching qualification or instructional ability.

Longer term proposals

37. The consultation sought views on some long term proposals for motorcycle training and CBT.
38. Introducing a training route to progressive licence access: respondents were supportive of this, subject to standards of training being maintained. DVSA believes those concerns could be addressed with the introduction of 'earned recognition' status. We are in favour of progressive access however we will need to fully scope the feasibility, security and cost implications to develop an IT system that would support this and issue an updated driving licence before we can consider taking this forward. The requirement for progressive access training to be quality assured will also need to be considered.
39. Regulating all motorcycle training: while support was expressed for this more responses were concerned about making sure existing trainers were subject

⁵ This approach is in accordance with the third statement of the Regulatory Code which Regulators must have regard to: *Regulators should base their regulatory activities on risk* https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf .

to a proper quality assurance regime, which tackles poor standards. Given the current regulatory arrangements that require trainers to be approved to deliver CBT or DAS training we consider that market forces do not favour 125cc training on its own as a viable business option and there are not sufficient numbers to warrant regulatory actions. We will keep this situation under review.

40. CBT undertaken on an automatic machine restricting the rider to riding only automatics: We will consider amending legislations to introduce this restriction as part of a range or package of regulatory changes however to introduce this change in regulation in isolation would be costly, in part because of the time scale it would require. However, DVSA will amend the CBT certificate to reflect a course undertaken on an automatic machine. There will be a corresponding advice note on the reverse recommending the holder undertakes further training before riding a machine with geared transmission. The website referred to in paragraph 26 will also reflect this advice.
41. The validity period for the CBT certificate: we do not intend to make any changes to this. We believe the two year period provides riders with sufficient opportunity to prepare for a test and to increase that period may discourage some riders from taking for a test.
42. The future developments of post-test training: DVSA acknowledges the criticisms about the Enhanced Rider Scheme and the requirement for it to be delivered only by trainers who are DVSA Registered Post Tests Motorcycle Trainers. We intend to consider how the scheme could be better promoted and delivered in the future.

NEXT STEPS

43. The proposals we intend to take forward, and the planned dates, are set out in the table below.

1. In conjunction with the training industry, we will develop training materials to help trainees ensure they can obtain the appropriate theoretical knowledge either before starting CBT or as part of the CBT course. (By April 2016)
2. We will improve and update our website content so that trainees can access better information about CBT. (By December 2015)
3. We will introduce changes to the CBT standards checks to focus on core trainer competencies of lesson planning, risk management and teaching and learning strategies in line with the National Rider Trainer Standard. (By January 2016)
4. We will commence risk-based, unannounced quality assurance visits. (By April 2016, subject to the outcome of a pilot trial)
5. We will make changes to the CBT certificate to reflect a course undertaken on an automatic machine and recommend that riders take further training if they want to ride a geared motorcycle. (Early 2016 subject to stock levels)
6. With input from the training industry, we will develop an earned recognition

<p>scheme to highlight those trainers who consistently deliver high quality training. (By end 2017)</p>
<p>7. We will explore how post-test training can be better promoted and delivered. (By April 2016)</p>
<p>8. In the longer term, we will explore opportunities to introduce legislative changes to the instructor qualification process to facilitate a separate down-training qualification. This may also provide an opportunity to consider other amendments to regulations, for instance a training route to progressive access, possible changes to the content and structure of the CBT syllabus and restricting riders who complete CBT on an automatic machine to riding only automatics.</p>

44. Further information about the changes and the timescales will be published on the DVSA website, e-mail alerts will also be issued.

MODERNISING COMPULSORY BASIC TRAINING COURSES FOR MOTORCYCLISTS

QUESTIONS

1. What do you think about the proposal to align compulsory basic training with the National Standard for Driver and Rider Training frameworks?
2. How should training materials be developed to reflect the National Standards?
3. Should the training materials be developed by the training industry, DVSA or another body?
4. Do you agree or disagree that training should be tailored to suit the needs of the individual trainee? Do you think this is a good thing?
5. If you are a trainer, do you already tailor training to suit the trainees' learning needs? Or would you need support to change your training methods?
6. How can trainers ensure trainees have the right level of theoretical knowledge and understanding before starting the practical part of the CBT course? Should there be a shortened theory test as part of CBT or before the course starts? Or should trainees pass a full theory test before undertaking CBT?
7. How can trainers ensure trainees have demonstrated their competence to ride independently during the on road element of the CBT course?
8. Do you agree raising public knowledge about CBT is a good idea? How do you think public knowledge could be improved?
9. How can we help the public improve their knowledge about CBT, what to expect from their trainer and what they need to know about the Highway Code and suitable protective clothing?
10. How could public awareness be raised to help people understand that two hours on-road riding is only meeting the minimum requirement and that many riders will find that they may need more on-road experience before they can meet the minimum standards of competence?
11. Do you think plans to revise the standards check so it supports a risk based approach to quality assurance and 'earned recognition' status for good trainers is a good idea?
12. What evidence does DVSA need from trainers to show that they meet the standard for 'earned recognition' status? For example internal processes, other qualifications, continued professional development.
13. Do you think the qualification process for motorcycle trainers needs to change?

We asked for trainers' views about what should be included in the assessment; whether this should be a regulated test, similar to that for Approved Driving Instructors; and limit the number of attempts to qualify. We were also interested on whether there should be a time limit to the down trained instructor certificate before they go on to become fully qualified.

14. Do you think DVSA should recognise qualifications from other organisations?
15. Do you think there should be one assessment for trainers and an additional assessment for those who want to down train other instructors?
16. Should there be any changes to the down trained instructor process and if so what should those changes be?
17. Should the down trained instructor certificate be limited to a certain period before they become fully qualified? If so how long should that be for? 2 years, 5 years or another period?
18. We'd be interested to hear if you have any other views about the instructor qualification process.

We also asked for comments, concerns or questions about some longer term proposals for motorcycling training that we are considering:

19. Training route to progressive access.
20. Regulating all motorcycle training.
21. Undertaking CBT on an automatic machine restricts the rider to riding only automatics.
22. The validity period for the CBT certificate.
23. What future developments would you be interested in seeing for post-test training?

MODERNISING COMPULSORY BASIC TRAINING COURSES FOR MOTORCYCLISTS

DETAILS OF RESPONSES⁶

Question No. 1 – What do you think about the proposal to align compulsory basic training with the National Standard for Driver and Rider Training frameworks?

Breakdown of responses by strength of opinion

Great idea	176	53.82%
Don't mind	52	15.90%
Not sure	71	21.71%
Bad idea	25	8.56%

Summary of views expressed

1. We received 175 comments. Some of these were unrelated to the question asked but respondents had taken the opportunity to express concerns that CBT should be undertaken by car drivers, novice car drivers were not restricted to smaller powered vehicles and that the proposal was a means to restrict motorcycling.
2. There was some confusion amongst some respondents about what was being proposed here as they were not familiar with the National Standard for Driver and Rider Training or what it is intended to achieve. The National Standard sets out the skills, knowledge and understanding needed to deliver a programme of driver/rider training. This Standard sets out the knowledge, skills and understanding needed to deliver successful learning. Trainers are expected to deliver agreed syllabuses using a 'client-centred' approach and be able to help the learner to identify obstacles to learning and develop strategies for overcoming those obstacles.
3. Many respondents thought that 'standard' referred to the standard of riding that learners were required to demonstrate. As a consequence this was reflected in the comments they went on to make, expressing concerns that raising the standard of riding would make training more difficult for learners and this would discourage prospective riders. Respondents also thought that this would mean that trainers' costs would also increase, leading to an increase in the cost of a course, which would further discourage learners.
4. It was also pointed out by some respondents that different skills are required for car and motorcycle instruction and competent driving/riding and that the framework should differ accordingly.
5. Comments from respondents who understood the aims of the Standard were broadly in favour of aligning CBT with the elements in the Standard. Alignment might help to reduce the disparity of the standard of training experienced or delivered and

⁶ The 'breakdown of responses by strength of opinion' tables reflect the on-line responses only.

would discourage CBT delivered by rote, *'with no consideration of existing knowledge, skills, experience'*.

6. There was an expectation that good trainers and Approved Training Bodies will already be applying these principles.

7. Respondents thought that aligning CBT with the Standards would provide a clearer idea of the behaviours that riders would need (and therefore need to be taught) to be a safer rider and provide a better opportunity to assess how courses are delivered.

8. Some concerns were expressed that CBT is basic training and whether it could be successfully aligned to the Standards. These respondents also queried whether the Standards covered the CBT syllabus and that fundamental changes were needed to the syllabus to make it more effective.

Question No. 2 – How should training materials be developed to reflect the National Standards?

Summary of views expressed

1. 174 comments were received in response to this question.
2. There was broad support for training material to be developed that would be universally available and establish uniformity. Comments reflected that this approach would also help to standardise the 'classroom' based elements of the course.
3. There was wide support for the training material to be available on-line so that trainees could be encouraged to access the information prior to attending the course. Suggestions were made for on-line resources to include testing hazard perception skills and other interactive IT material to highlight riders' vulnerability; DVD or videos demonstrating on-road skills and road awareness.
4. Comments were also made that the training materials need to link to the aims of CBT, how that fits in the wider road safety picture and to emphasise that CBT is the beginning of training and not an end in itself.
5. Views were also expressed about the need to develop training materials for trainers, particularly to help them develop 1 to 1 coaching skills for the Element E (Practical on road riding).

Question No. 3 – Should training materials be developed by the training industry, DVSA or another body?

Breakdown of responses by strength of opinion

Training industry	60	18.35%
DVSA	36	11.01%
Both	178	54.43%
Other	53	16.21%

Summary of views expressed

1. Although 53 respondents had indicated 'other', of those 53: 6 said training industry, with a further 9 specifically identifying MCITA and 13 said both. 6 respondents suggested an independent body, possibly working with stakeholders and DVSA and DfT be set up to oversee the development of training materials.
2. A number of respondents felt that police expertise should also be involved and contribute to the development of the training materials.
3. Many respondents felt that DVSA and DfT had a role to co-ordinate and control the quality and content of training materials.
4. 18 respondents commented that training materials should be developed by those with '*day to day experience and skills in delivering rider training*'.

Question No. 4 – Do you agree or disagree that training should be tailored to suit the needs of the individual trainee?

Breakdown of responses by strength of opinion

Agree	269	82.26%
Disagree	51	15.60%
Don't know	11	3.36%

Question No. 5 – Do you already tailor training to suit the trainees' learning needs? (Only respondents who had indicated they were trainers were directed to this question)

Breakdown of responses by strength of opinion

Yes	82	96.47%
No	2	2.35%
No – I'd need support to change my training methods	1	1.18%

Question No. 6 – How can trainers ensure trainees have the right level of theoretical knowledge and understanding before starting the practical part of the CBT course?

Breakdown of responses by strength of opinion

			Included in 'other'	113	34.56%
Shortened version of the theory test as part of the CBT course	59	18.04%		11	
Shortened version of the theory test	48	14.68%		6	

before starting the CBT course					
Must have passed the full theory test before starting the CBT course	107	32.72%		16	

Summary of views expressed as 'Other'

1. Of the 113 respondents who expressed 'Other' ways to ensure trainees have demonstrated the right level of theoretical knowledge:
6 said a shortened version of the theory test before starting the CBT course
11 said a shortened version of the theory test as part of the CBT course
16 said the trainee must have passed the full theory test before starting the CBT course
2. Other views expressed were that an information session take place before the course begins; or that already holding another driving entitlement would demonstrate theoretical knowledge.
3. 6 respondents thought that trainers should use questioning techniques and if it is clear from the responses that trainees have no prior knowledge about theoretical knowledge or the Highway Code, the trainer should refuse to continue.
4. There was an assumption among some respondents that trainees would have prepared for the course and have read relevant theory and Highway Code materials.
5. A number of trainers indicated they already conducted pre-course information sessions with prospective trainees in which they identified the level of theoretical knowledge. The trainer can then advise the trainee on whether they need to improve that and how to do so.
6. Some respondents felt that those trainees who already held another full driving entitlement had already demonstrated they had appropriate theoretical and Highway Code knowledge.
7. 20 respondents responded with similar comments that:
'...the best way to do this would be to require a Theory Test pass for provisional licence applicants (for all modes of transport)...However it has been suggested that a shortened online version that the candidate could complete before starting their CBT could be developed...'
8. A few comments were also received noting that CBT is basic training and therefore there should be no changes to the current arrangements.

Question No. 7 - How can trainers ensure trainees have demonstrated their competence to ride independently during the on road element of the CBT course?

Summary of views expressed

1. 327 comments were received in response to this question.
2. Respondents were concerned to point out that if competence to ride independently was not demonstrated, the CBT certificate must not be issued. The onus should be

on the trainer to assess riding properly and say if further training is required, if necessary postponing that for later sessions.

3. Many respondents commented that a 1 day course and 2 hour road ride is not sufficient time to demonstrate competence but that to extend the 2 hours may be too much for novice riders to be expected to accomplish satisfactorily and safely on the same day.

4. Although 11 respondents felt that trainees should successfully accomplish manoeuvres similar to those in module 1 and module 2 of the practical motorcycle test, one respondent pointed out that CBT is basic training and trainees shouldn't be expected to demonstrate test-ready riding.

5. One respondent commented that some trainers who may have little understanding of fault analysis and correction will lead to poor standards of instruction.

6. There was support (63 comments) for an assessment of independent riding towards the end of Element E. Slightly fewer respondents (48) suggested that trainers were best placed to determine whether the learner has demonstrated competence.

Question No. 8 – Do you agree raising public knowledge about CBT is a good idea?

Summary of views expressed

Yes	297	90.83%
No	14	4.28%
Don't know	16	4.89%

Question No. 9 – How can we help the public improve their knowledge about CBT, what to expect from their trainer and what they need to know about the Highway Code and suitable protective clothing?

Summary of views expressed

1. 278 comments were received in response to this question.

2. Most respondents suggested that this information should be made available by a combination of:

- Online/internet
- Video clips
- You Tube
- Social media

Many specifically mentioned that the GOV.UK should be the appropriate online location, although trainers' own websites were also referred to.

3. Some respondents were concerned that GOV.UK was difficult to navigate or was otherwise limited to the information that it could host and suggested that a separate website be developed.

4. It is clear that the Government *Think!* brand and its *Think! Bike* promotion has had an impact on the general public. Many responses referred to this and suggested a television advertising campaign.

5. More than 30 respondents felt that the information should be provided to trainees by trainers before they undertake the CBT course. Several trainers stated they were already doing this and also took the opportunity, where possible, to speak to parents/guardians so they were fully informed.

6. Publicising information about CBT in schools was also a popular suggestion. Around 25 respondents suggested that practical car driving test candidates be required to undertake a CBT, with the aim of ensuring they were better informed about motorcyclist vulnerabilities. Including information about CBT with the issue of provisional driving licences was also mentioned.

7. Just under 20 responses were received that indicated CBT candidates should take more responsibility themselves to ensure they know what to expect as they considered the information is already widely available and is also published on trainers' websites. A few comments were made to the effect that some people will not take any notice no matter what is given to them.

Question No. 10 – How could public awareness be raised to help people understand that two hours on-road riding is only meeting the minimum requirement and that many riders will find that they may need more on-road experience before they can meet the minimum standards of competence?

Summary of views expressed

1. 277 comments were received in response to this question.

2. 63 respondents suggested that more emphasis should be given to this in the online information, websites, social media and literature.

3. Other respondents considered that this was the responsibility of the trainer to ensure before the course started (in either pre-joining instructions or discussions) the candidate understood that if they did not meet the standard required they would not be issued a certificate. Other comments indicated that good trainers were doing this and offering second day training at discounted rates. Anecdotes indicated that some trainers are already successfully encouraging trainees to undertake another day of training, again often at a discounted price, after they have completed CBT.

4. Comments indicate that there is a real need to change the perception that CBT is a one-day course. Some respondents felt that the training industry themselves have created this issue as they are delivering the minimum required.

5. Support was evident to legislate for an increased minimum on road ride or to mandate that CBT is conducted over a minimum two days. One respondent suggested introducing an industry standard fee alongside that. Another felt that improvements to CBT would not be effective unless a minimum of two day's training was required.

6. 23 respondents felt that DVSA had a responsibility to provide better information about what a good trainer would look like and what they could expect from a quality training course. Responses also suggested that DVSA should be more proactive

monitoring training schools and removing approvals when it was clear the minimum had not been met or that training standards were poor.

Motorcycle Instructors – qualification process and standards checks

1. We asked a series of questions about the trainer qualification process, including provisions to train other trainers and arrangements to approve of those ‘down-trained’ trainers.
2. The consultation paper also informed readers of our intentions to revise the Standards Check, to better align with the National Standard for Driver and Rider Training and to support a risk based approach to quality assurance.
3. Respondents were also given the opportunity to give any other views about the trainer qualification process and how trainers could demonstrate they met the standard for ‘earned recognition’ status.

Question No. 11 - Do you think plans to revise the standards check so it supports a risk based approach to quality assurance and 'earned recognition' status for good trainers is a good idea?

Breakdown of responses by strength of opinion

Yes	232	70.95%
No	36	11.01%
Don't know	59	18.04%

Question No. 12 - What evidence does DVSA need from trainers to show that they meet the standard for 'earned recognition' status? e.g. internal processes, other qualifications, continued professional development

1. Included in the 263 responses received were the following suggestions:

Continuous professional development	60
Other qualifications (including trainer/ teaching qualifications)	38
Spot checks/mystery shopper/ unannounced standard checks	33
More DVSA assessments (including periodic re-qualification tests)	25
Feedback from trainees or anonymous complaints	20
ATBs' internal monitoring processes for their trainers	9
Nothing – leave as is	7
Correlation to module 1 and 2 pass rates	5

2. 21 responses were received which each used identical text:
Any trainers or ATB's who gain 'earned recognition' status must be of a consistent and recognised standard such as those accredited by MCIAC. They should also be subject to regular quality assurance inspections and utilise customer feedback to ensure that standards are maintained all year round and not just when inspected.
3. 10 responses expressed concerns that a lack of qualification does not mean poor quality training, there are cost implications and practical difficulties for small ATBs to allow trainers time away from the instructing to undertake additional qualification

courses. The point was also made that holding a qualification for instance does not necessarily mean that they have good inter-personal skills or that they are putting the learning into practise.

4. Another respondent commented that most trainees choose their trainer by recommendation and they didn't think that an 'earned recognition' from DVSA would influence which CBT trainer the trainee would choose.

Question No. 13 - Do you think the qualification process for motorcycling trainers needs to change? We are interested to hear views about what should be included in the assessment; whether this should be a regulated test, similar to that for Approved Driving Instructors; and limit the number of attempts to qualify. We would also be interested in your thoughts on whether there should be a time limit to the down trained instructor certificate before they go on to become fully qualified

Breakdown of responses by strength of opinion

Yes	192	58.72%
No	97	29.66%
Tell us how you think it could be improved	179	54.74%

Summary of views expressed

1. Although over half of the respondents answered 'yes' to this question, a significant number of respondents took this opportunity to comment on 'down training' arrangements and suggest changes to that facility. Those comments have been collated with the responses to Question No. 16.

2. A small number of respondents suggested that:

- The qualification process be left as it is
- It should include an assessment of client centred coaching techniques
- The assessment (and subsequent standards checks) be more rigorous and demanding
- Role play elements should be discontinued

3. 25 responses were received which each used identical or virtually identical text:

Student instructors should be assessed at their ATB, with genuine students so real life training can be observed and the need for spending days at Cardington is removed. This can be a huge burden for some ATB's who are a long distance from there. In addition the role play element is seen as unrealistic so observing Instructors with real customers will give a much more accurate picture of their skills.

4. The number of respondents who supported limiting the number attempts to successfully complete the trainer assessment was equal to those who did not support limiting the number of attempts.

5. A total of 17 respondents (including those who responded with comments to 'Any other views') suggested that the assessment be made available on a regional basis, rather than only at Cardington Training Academy. Costs and travel distance were of particular concern.

6. 25 respondents supported introducing regulation to qualify as a trainer. Many also drew comparisons about the time aspects of the two day assessment for motorcycle trainers compared to the examination process for Approved Driving Instructors.

7. There was broad support for splitting the trainer qualification so that those trainers who wished to train others are required to undertake a separate assessment for those skills. On the same theme, it was suggested there also be a separate process for those who wish to be authorised as an Approved Training Body; and a Direct Access Upgrade to facilitate a training option to progressive access if that were to be introduced.

Question No. 14 - Do you think DVSA should recognise qualifications from other organisations?

Breakdown of responses by strength of opinion

No	69	21.10%
Don't know	147	44.95%
Yes – the following qualifications	111	33.94%

Summary of views expressed

1. Of the 111 suggestions, 39 mentioned a combination of IAM, ROSPA, emergency services and police qualifications.

2. However, other respondents made the point that these qualifications focus on riding (or driving) competence and not proven instructional ability and that trained observers cannot necessarily instruct. They suggested that teaching or coaching qualifications be required and that DVSA should focus on instructional capability.

3. A small number of respondents had taken the opportunity to respond 'yes' but then commented that only successful completion of the DVSA trainer assessment should be recognised. One concern expressed was that a two-tier system would be created.

4. A small number of other respondents made the distinction between running an ATB and providing instruction

5. 23 respondents mentioned MCIAC and the Motorcycle Industry Accreditation Centre award, each using identical or virtually identical text:

MCIAC have reached Approved Centre Status and launched a new organisation, the Motorcycle Industry Accreditation Centre (MCIAC). The award offered by MCIAC move training on a level from the prescribed DVSA requirements and insists on regular quality assurance to maintain MCIAC accreditation

Question No. 15 - Do you think there should be one assessment for trainers and an additional assessment for trainers who want to 'down train' other trainers?

Breakdown of responses by strength of opinion

Yes	207	63.30%
No	62	18.96%

Don't know	58	17.75%
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Question No. 16 - Should the 'down trained' instructor certificate be limited to a certain period before they must become fully qualified?

Breakdown of responses by strength of opinion

No	61	18.65%
Don't know	74	22.63%
Yes – 2 years	117	35.78%
Yes – 5 years	28	8.56%
Yes – Other (please specify how long)	47	14.37%

1. Of the 47 'other' 15 suggested 1 year, small numbers suggested 2, 3 and 4 years.
2. A couple of comments were made that many trainers work part time hours and so either don't need to be fully qualified or it could take them longer to become fully qualified.
3. One comment pointed out that limiting the time period could mean that some ATBs simply engage another down trained instructor rather than encouraging and supporting the existing down trained instructor to undertake the DVSA assessment.
4. It was also suggested that DVSA endorse or ratify a down trained instructor's certificate within a short time of its issue.
5. There were 4 suggestions to require a minimum time to be served as a down trained instructor, to gain experience, before being permitted to undertake the DVSA assessment.
6. Other respondents (8) considered that trainers' view should be taken into account here.
7. We also asked: **Should there be any other changes to the 'down trained' instructor process?** 93 respondents took the opportunity to provide comments. The analysis of responses also includes the comments made in response to Question No. 13.
8. There is clear support for the 'down trained' instructor authorisation process and it is seen as '*vital*' to the industry. However comments reflect that it should be formalised and controlled to ensure these trainers are assessed by DVSA within a short period of time.
9. It was considered by some respondents that the down trained process works well providing the training received was delivered by experienced instructors who were able to provide quality 'train the trainer' training. Regular monitoring and mentoring to encourage the down trained instructor to undertake the DVSA assessment was considered important.
10. Some respondents considered the down trained instructor should automatically fully qualify if they successfully met the standards check criteria.

11. Other respondents pointed out that the down trained instructor – the least qualified instructors are teaching the least experienced trainees who are also amongst the most vulnerable road users.

12. Some respondents observed that a lot of keen motorcyclists apply to become down trained instructors, however that does not necessarily mean they have the appropriate skills to coach or ensure the training is client centred.

13. Some ATB authority holders were concerned about the expense of training and preparing a down trained instructor to undertake the DVSA assessment for them then to leave and set up in competition or go to another school. In contrast to that is the view from the down trained instructor that the ATB is reluctant to expend the time and money to ensure they become fully qualified.

14. Other comments received:

- Down trained instructors who have not actively been instructing should have to requalify;
- If there is no time limit on how long an instructor can remain as down trained there is no incentive to undertake the DVSA assessment;
- More guidance is required for instructors training others to instruct;
- Reduce the number of down trained instructors ratio to certified instructor;
- More standards checks and quality assurance from DVSA.

Question No. 17 - Any other views about the instructor qualification process

1. The suggestion to conduct instructor assessments in locations other than Cardington, which respondents also made elsewhere, was a popular response here. Respondents also reiterated support for the proposal to introduce a separate qualification to down train instructors.

2. Some respondents suggested that DVSA have a bigger role in providing guidance for training trainers, to encourage and/or develop a formal structure for continuous professional development.

3. There was support for greater professionalisation of the instructor profession to encourage excellence in training. There was an expectation for DVSA to provide a rigorous quality assurance regime to ensure poor or non-compliant instructors are removed.

Longer term proposals

We have taken the opportunity of this consultation to seek views on some long term proposals for motorcycle training and CBT.

Introducing a training route to progressive licence access

Progressive access is a process that allows a rider to take a higher-category practical test if they already have at least two years' experience on a lower-category motorcycle. For example, if you have held a category A2 licence for a minimum of two years, you can take the category A practical test at age 21. There is no requirement to take another theory test. The 3rd Directive (Directive 2006/126/EC) gives Member States the option for progressive access to be completed by either a testing or training route. We asked respondents for their views about this and are keen to explore the options for introducing the training route to upgrade from one

category to the next. This would also be the opportunity to consider possible changes to the content and structure of the CBT syllabus along with other legislative changes.

Summary of responses received

1. 94 comments were received in response to this proposal.
2. 39 respondents agreed a training route to progressive access should be introduced. Some of those were concerned to ensure standards were maintained and included the proviso that only those instructors who had the appropriate skills, experience, qualifications or approvals should be able to conduct this training.
3. The proposal was seen as an opportunity to gain more on-road riding experience and improve riding skills before progressing to a more powerful motorcycle.
4. 10 respondents took the opportunity to express their frustration that the route to licence acquisition for motorcycles and the age restrictions was not consistent with that for car licence holders.
5. 12 respondents considered that the requirements of the European legislation for motorcycle licence acquisition, provided for by the 3rd Driving Licence Directive, were discouraging younger riders from undertaking the A1 test.
6. 3 respondents did not think this option was necessary and that it would be too expensive.

Regulating all motorcycle training

Summary of responses received

1. 139 comments were received in response to this proposal.
2. A small number of respondents took the opportunity to express concerns about the provisions of the 3rd Driving Licence Directive and the perceived inconsistency between licencing for motorcycle riders and car drivers.
3. 6 respondents considered that the current arrangements were sufficient.
4. Of a total of 49 responses indicating support for regulation for all motorcycle instruction:
 - 4 respondents said that *MCITA believes that all motorcycle training should be regulated.*
 - 18 responses included part or all of the following text:
Robust quality assurance for ATB's and Instructors over and above the current DVSA requirements must be in place to ensure better, consistent standards of training across the country. Without this less scrupulous trainers would be able to cut corners and offer 'cheap' upgrades. All motorcycle training should be regulated it cannot be acceptable for trainers who have no formal qualifications to charge fees for teaching anyone to ride a motorcycle. Organisations such as BikeSafe, RoSPA and the IAM would need special consideration as they have their own processes in place for the assessments and/or training offered.

5. Comments received expressed concerns that enthusiastic amateurs, ex-professional riders and observers for some road safety bodies, while they may be competent riders themselves, may not necessarily have the appropriate skills or qualifications to provide instruction.

6. Some respondents considered regulation as a solution to prevent potentially dangerous opportunists from establishing training businesses.

7. 4 responses suggested that advanced training or on-track training be excluded from this regulation.

8. 8 respondents did not agree that all motorcycling training should be regulated, comments included:

- Too much regulation would affect the industry
- It would put off prospective riders
- Need to balance costs and practicality, would increase costs
- Does DVSA have sufficient resources to enforce it?
- Associations such as IAM, ROSPA and BikeSafe all operate within their guidelines

9. 20 respondents commented about the need to ensure a quality standard of training was met and maintained. There was support for DVSA action to remove unscrupulous, non-compliant or poor trainers and ATBs and for unannounced standards checks.

Views about CBT undertaken on an automatic machine restricting the rider to riding only automatics

Summary of responses received

1. 211 comments were received in response to this proposal.
2. There was overwhelming support for this, with some respondents expressing surprise that the restriction didn't already exist and that it was a '*no brainer*'.
3. 13 respondents disagreed and 5 felt it was unfair for 16 year olds who are restricted to category AM vehicles by virtue of their age and 10 respondents thought this was not an issue. However, many of the responses came from trainers who already offer additional short training sessions for riders who have taken CBT on an automatic and decide to ride a geared motorcycle. Anecdotes from trainers were that these courses are well received.
4. Some trainers commented that although the on-road ride is completed on an automatic motorcycle, use of gears is covered elsewhere during the CBT course.
5. Many of the respondents who expressed support for this proposal also suggested that an 'upgrade' session be available to riders who had taken CBT on an automatic motorcycle and who later wished to ride a geared motorcycle.

The validity period for the CBT certificate

Summary of responses received

1. 216 comments were received in response to this proposal.
2. 82 respondents thought that the current 2 year validity period should not be changed. A further 24 commented:
Industry is opposed to any change to the CBT validity period. There is no evidence to support that riders are having high rates of accidents in their second year of CBT. As with novice drivers, risk and riding skills improve with the length of time riding on the road. Instead, we wish to see more proactive measures to engage novice riders with a desire to take the test, utilising positive incentives (not punitive measures), plus rider engagement with the log book principle to create a sense of desire to progress motorcycling careers and bringing in the 7 hour training licence upgrade. There will always be some who choose not to take the motorcycle test, however industry does not believe that these riders are over represented in casualty statistics. Choice, economy, fear of test (test nerves) are some of the reasons individuals give as to why their customers do not take the test.
3. A small number of comments were submitted expressing concern that by not limiting the validity period or restricting the number of times a CBT could be taken was encouraging a 'permanent learner' culture and that more should be done to encourage riders to take a test.
4. Some respondents suggested that the validity period should be determined by the age of the rider or that car licence holders should not need to repeat after completing an initial CBT.
5. There was limited support for extending the validity period beyond 2 years.

Suggestions for the future developments of post- test training

Summary of responses received

1. 150 comments were submitted.
2. The Enhanced Rider Scheme, delivered by trainers who are DVSA Registered Post Test Motorcycle Trainers, was referred to by 18 respondents. They all considered that it needed more promotion from DVSA and/or rebranding to encourage participation and that ways to incentivise participation needed to be considered. A number of trainers commented that the cost of registration was not worth the small financial return from the limited take-up.
3. 12 respondents also commented that:
The Enhanced Rider Scheme was developed to put in place standards in the unregulated post test training market. The scheme appears to have been sidelined and numbers of Instructors who can offer this are dropping. I believe that post test training is important and should be encouraged. The slow decline of ERS demonstrates that the DVSA have no interest in this important part of rider development.
4. There appears to be a consensus that a lot of novice riders (and drivers) are reluctant to take further training once they have passed the test. Comments reflected a need to change attitudes of novice riders and develop a culture that encourages additional training after test.

5. 11 respondents specifically considered that the insurance industry had a role providing incentives by way of discounted premiums to encourage post test training.

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Driver and Vehicle Standards Agency

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