



A CONSULTATION PAPER

INTRODUCING THE NEW PRACTICAL MOTORCYCLING TEST AND ASSOCIATED FEES

An executive agency of the

Department for
Transport



Awarded for excellence



INVESTOR IN PEOPLE

November 2008

INSIDE FRONT COVER - LEAVE BLANK - INSIDE FRONT COVER

Introducing the new practical motorcycling test and associated fees

Table of Contents

section	page
Table of Contents	1
Glossary	1
Introduction	2
Table of Proposals	2
Executive Summary	3
Impact Assessment	3
How to Respond	3
Disclosure of Information	4
Application within United Kingdom	4
The Proposals	7
<i>Annex A - Coverage map on 30 March 2009 (63 Operational sites for module 1 tests).</i>	12
<i>Annex B - Initial impact assessment (Modular Testing)</i>	13
<i>Annex C - Initial impact assessment (Test fees)</i>	27
<i>Annex D - Consultation List</i>	39
<i>Annex E - Better Regulation Executive: Code of Practice on Consultations</i>	40

Glossary

abbreviation	definition
ATB	Approved Training Bodies
CBT	Compulsory Basic Training
CAT A	Motorcycling Licence
DAS	Direct Access Scheme
DfT	Department for Transport
DSA	Driving Standards Agency
DTC	Driving Test Centre
EIA	Equality Impact Assessment
GIBS	Group Incentive Bonus Scheme
IA	Impact Assessment
MMA	Motorcycle Manoeuvring Area
MPTC	Multi-Purpose Test Centre
MTV	Minimum Test Vehicle
ROCE	Return on Capital Employed
RPI/CPI	Retail Price Index/Consumer Price Index
RPMT	Register Post Test Motorcycle Trainers
LtD	<i>Learning to Drive</i>
VOSA	Vehicle Operator Services Agency

Introduction

1.1 In October 2000 the European Commission adopted Directive 2000/56/EC that introduced higher standards for all driving tests. Implementation of the Directive was originally required by 2005, but the Commission and Member States subsequently agreed a deferment until 29 September 2008¹ because of implementation difficulties faced by some Member States.

1.2 After consultation in 2002² Ministers decided that, in the interests of road safety, the Driving Standards Agency (DSA) would deliver the new motorcycling manoeuvres off-road from 50-75 multi purpose test centres (MPTCs), supplemented by a number of occasional centres.

1.3 Providing suitable premises to carry out the manoeuvres off-road has been extremely difficult. In order to provide capacity to better meet customers' reasonable expectations we concluded that it was necessary to delay implementation of the new motorcycle test for six months.

1.4 DSA was established as a Trading Fund in 1997³. As a Trading Fund, the Agency is normally required to recover the costs of any services that we deliver.

1.5 The table below sets out our main proposals on which we are seeking your views:

Table of proposals

A modular motorcycling test		page
1	Introduce a split practical motorcycling test from 30 March 2009 at an unchanged overall fee of £80, <ul style="list-style-type: none">• Module 1 – Specified Manoeuvres test with a fee of £10.00.• Module 2 – Road riding test with a fee of £70.00.	7
2	Module 1 must be completed before module 2.	9
3	Both modules must be completed within 24 months of passing the relevant theory test. The candidate must also hold a valid Compulsory Basic Training (CBT) certificate.	9
4	Introduce minimum wait after failed modules <ul style="list-style-type: none">• Module 1: Three clear workings days before retaking• Module 2: 10 clear workings days before retaking	10
5	Increase the fee for the practical motorcycling test to an overall £90.50 for tests taken on or after 5 October 2009. If a modular test is introduced, set new fees for each module: <ul style="list-style-type: none">• Module 1: £15.50• Module 2: £75.00TOTAL: £90.50	10

¹ Directive 2008/65/EC

² Delivering the new motorcycle test - December 2002

³ The Driving Standards Agency Trading Fund Order 1997 [as amended] SI No. 873/1997

Introducing the new practical motorcycling test and associated fees

Executive Summary

2.1 This consultation seeks your views on proposals to improve delivery for the new practical test taken by learner motorcycle and moped riders by splitting it into two modules. Subject to consultation, we propose to introduce a modular practical motorcycling⁴ test on 30 March 2009.

- Module 1 will be a specified manoeuvring test
- Module 2 will be a road riding test.

2.2 We propose to retain the current fee of £80 for the overall practical motorcycling test but, if a modular approach is adopted, introduce a separate fee for each module:

• Module 1:	£10.00
• Module 2:	£70.00
TOTAL:	£80.00

2.3 We further propose to increase the fee for the practical motorcycling tests taken from 5 October 2009 to £90.50 overall. If a modular test is introduced, the fee for each module will be:

• Module 1:	£15.50
• Module 2:	£75.00
TOTAL:	£90.50

2.4 This proposed fee level will cover the extra cost incurred to deliver a modular motorcycling test. The main cost is the extra examiner resource required to conduct module 1 tests.

Impact Assessments

3.1. We have prepared initial Impact Assessments (IAs), detailing the proposed modular motorcycling test and fee increases which are at *Annexes B and C*. These IAs will be developed in the light of any comments received in response to this Consultation Paper.

How to respond

4.1. Please use the Reply Form at: <http://www.dsa.gov.uk/Category.asp?cat=594> to respond to this Paper and the IAs.

4.2. If you have difficulty downloading the Paper please e-mail us at: consultations@dsa.gsi.gov.uk or contact us by telephone: 0115 936 6093.

4.3. If you are unable, or do not wish, to respond electronically, please reply by post using the Reply Form to:

- DSA Policy Unit, The Axis, 112 Upper Parliament Street, Nottingham, NG1 6LP.

4.4. We have allowed six weeks for comment. We should be grateful if responses could arrive no later than 9 January 2009. Please note that we are unable to consider any comments received anonymously and only those responses received either electronically or by post using the Reply Form will be accepted. We will acknowledge every response.

4.5 We have adopted a six week consultation period rather than the normal consultation period of 12 weeks for the following reasons:

- we have already engaged with key stakeholders in the motorcycling industries pre-consultation in developing these proposals and they are anxious to see them progressed.

⁴ For the purposes of this consultation, motorcycle include moped (unless the context requires otherwise)

- trainers and candidates want as much notice as possible about the arrangements to operate from the end of March 2009. This requires an early decision which in turn necessitates a shorter consultation period than usual

4.6. We have written to those organisations and persons listed at *Annex D* to notify them of this Paper. That list is not exhaustive. It is representative of the types of organisations to which we have sent the paper. Please tell us if you think that we should notify other organisations or individuals about this Paper. The Paper is also posted on our website at: www.dsa.gov.uk

4.7. If you are replying on behalf of an organisation, it would be helpful if you could tell us who you are representing, the nature of the organisation, how many individuals' views are included within the response and what steps you have taken to gather those views.

4.8. We shall use the responses received to this consultation exercise to inform Ministers of the views of key stakeholders. A report based on the responses will be produced and posted on our website at: www.dsa.gov.uk. We will contact everyone who sends us comments to tell them when a *Response to Consultation* Report is available.

4.9. We have produced this Paper in accordance with the principles of the *Code of Practice on Consultations* except for the normal duration, which are reproduced at *Annex E*. If you consider that this Paper does not comply with the criteria, please write setting out the areas where you feel the Paper departs from the criteria to:

- Graham Law, Consultation Co-ordinator, Driving Standards Agency, The Axis, 112 Upper Parliament Street, Nottingham, NG1 6LP.
- e-mail: graham.law@dsa.gsi.gov.uk
- telephone: (0115) 936 6090
- minicom: (0115) 936 6660

Disclosure of information

5.1. The Driving Standards Agency (DSA) is an executive agency of the Department for Transport (DfT). Your personal data will be processed by DSA for the purpose of administering the 2008 motorcycling consultation and help Ministers to reach an informed decision on the proposals.

5.2. In line with our policy on openness, it is our intention to make available the responses we receive. We will publish them on our website – www.dsa.gov.uk - at the end of the consultation period, unless you specifically ask us not to do so. You should also be aware that we might have to disclose your response if asked to do so as part of a request for information made under the Freedom of Information Act 2000. You may ask that your response is kept confidential, but we will only be able to do this if withholding the information is consistent with the obligations under that legislation. Please note that a confidentiality disclaimer generated by an IT system in e-mail responses will not be regarded as a confidentiality request. If third parties ask for hard copies of responses, we will make a reasonable charge for processing and copying.

5.3. Personal data is not disclosed to, or shared with, any third parties other than in accordance with the Data Protection Act 1998. For further information, please see our privacy notice on our website – www.dsa.gov.uk. Details of the DfT's / DSA's registration with the Information Commissioner can be viewed on the Data Protection Public Register on the Commissioner's website – www.ico.gov.uk. DfT's registration number is Z7122992.

Application within the United Kingdom

6.1. The Secretary of State for Transport has responsibility for driver training and testing in Great Britain. Driver training and testing are matters reserved to Westminster as regards Scotland and Wales. Legislative responsibility within Northern Ireland is devolved to the Northern Ireland Assembly under the Northern Ireland Act 1998. These proposals do not apply to Northern Ireland which has already decided to implement a two-part practical motorcycling test in its transposition of the new and more demanding requirements for practical motorcycling testing.

Introducing the new practical motorcycling test and associated fees

The motorcycle training and testing regime

7.1 Anyone wishing to ride a motorcycle has to complete Compulsory Basic Training (CBT) before being allowed onto public roads. This allows them to practise unsupervised on 'L' plates for up to two years during which they must either pass both the theory and practical motorcycling tests or undergo CBT again.

7.2 DSA regulates Approved Training Bodies (ATBs) who provide CBT courses for learner riders using either standard learner machines (up to 125cc) or learners using large motorcycles under the Direct Access Scheme (DAS).

7.3 Those wishing to ride a larger motorcycle can opt to do so within DAS if they are 21 years of age or over. They are required to pass their practical test on a larger machine and therefore are allowed as learners to practice on larger machines. DAS learners typically take a further training course which on average is of three to four days in duration. DAS courses are delivered on a 2:1 Trainee/Instructor ratio. The training is carried out with the instructor in radio contact at all times and trainees cannot practice on the road unsupervised. These courses are not subject to regulation but DSA offers quality assurance arrangements.

7.4 In a normal year DSA conducts about 90,000 practical motorcycling tests. Taking account of the 65% to 66% pass rate this represents about 60,000 individual candidates per year. Since its introduction in 1997 over 80% of people taking motorcycling tests, take the DAS route.

EU Legislation

7.5 European Community Directive 2000/56/EC⁵ required that, after 29 September 2008, the practical motorcycling test should include new and more challenging special manoeuvres. One of these manoeuvres must be undertaken at speeds of 30 km/h (18.6 mph) and two at 50km/h (31.2 mph).

7.6 Following public consultation in 2002 it was decided that:

- it would not be safe to conduct these higher-speed manoeuvring exercises on-road so special premises would be needed and;
- these premises should be MPTCs, offering enhanced services for all candidates including those undertaking other categories of driving test.

Delivery solutions

Multi Purpose Test Centres

7.7 DSA originally planned a national network of 66 MPTC sites which would deliver approximately 83% service coverage within a 45 minute / 20 mile 'travel to test' distance. These sixty-six sites would also mean that 96% of the population would fall within 60 minutes travel time and 99.5% within 90 minutes.

7.8 DSA has encountered considerable difficulties in securing sites where suitable test centres can be developed. As a result, MPTCs were not available in all areas of the country by 29 September 2008. This would have meant some candidates facing lengthy journeys (over 100 miles in exceptional cases) to take their practical riding test. DSA was concerned about the limited coverage, general inconvenience and poor customer service this would cause.

7.9 In the light of difficulties in acquiring a suitable and sufficient estate, DSA received representations from the motorcycling interests requesting deferment of the new practical motorcycling test. By August 2008, it had become clear that only 38 of the planned MPTCs would be operational by

⁵ As read with directive 2008/65

29 September. On 3 September Jim Fitzpatrick (Parliamentary Under Secretary of State for Transport) met with representatives of the motorcycle interests. Their concerns largely centred on the number and location of MPTCs delivering the new practical motorcycling test.

Motorcycling test deferment

7.10 Having taken account of the views expressed, it was agreed that the Agency should defer implementation of the new test for a period of six months to allow a wider range of locations from which the test could be offered. Currently there are 38 operational MPTCs.

Our new strategy for delivering the new practical motorcycling test

7.11 Difficulties arose in trying to provide the 66 MPTC sites because of the conflicting requirements of the two elements of the test. Namely – sufficient land on which to conduct the specified manoeuvres and ready access to on-road routes offering a sufficiently demanding test of riding ability.

7.12 We have sought to develop a new strategy to facilitate the introduction of the new practical motorcycling test which will offer greater coverage by splitting the two modules of the test. This action accords with the approach taken in the recent *Learning to Drive* Consultation as a way of supporting an improved educational process.

7.13 At launch of the new practical test on 30 March 2009 we plan to have in place 63 operational sites available from which we can conduct Module 1 element tests:

- 45 MPTC
- 15 Vehicle, Operator Services Agency (VOSA) sites (weekend only)
- 3 Casual/Part time sites

TOTAL: 63

Details of the likely coverage provided by the 63 sites is shown on the map at *Annex A*.

7.14 In addition we propose to deliver the Module 2 road riding test from a network of around 100 locations:

- 45 MPTC
- 55 Driving Test Centres (DTC) (approximately)

TOTAL: 100

7.15 The use of DTCs, VOSA and casual sites will be gradually reduced as further MPTCs are opened.

7.16 Subsequently we shall have more MPTCs coming on-stream, which will be supplemented by other manoeuvring sites made possible by the adoption of modular testing. Our site agents indicate that working with the modular testing model will give us more success in identifying sites for the specified manoeuvres element of the test.

Consultation process

7.17 This consultation paper explores the option of splitting the practical motorcycling test into two modules; a specified manoeuvres test and a road riding test. Adopting a modular approach to the practical test would provide the opportunity for DSA to achieve wider coverage for customers.

PROPOSALS

8.1 The proposals in this consultation paper relate to the practical motorcycling test and will apply to all candidates wishing to obtain a full motorcycling licence.

PROPOSAL 1: Introducing a split practical motorcycling test.

What will this mean?

8.2 The motorcycling practical test will be split into two modules.

- Module 1 will be an assessment of the specified motorcycling manoeuvres and will last for 22 minutes.
- Module 2 will last for 57 minutes and will include an eyesight test, 33 – 35 minutes of road riding, completion of paper work and radio fitting.

8.3 The fee for the motorcycling test will be split to reflect the modular format of the test but will remain at a total of £80. We propose to split the fee as follows:

Test	Proposed fee
Module 1: Specified motorcycling manoeuvres	
standard weekday	£10.00
standard out of hours	£10.00
Module 2: Road riding test	
standard weekday	£70.00
standard out of hours	£82.00
extended weekday	£140.00
extended out of hours	£164.00

8.4 The fee for the Module 1 test would not be liable to a premium fee for out of hours testing as some of the sites that will offer the Module 1 test may only have limited availability. Also, the standard Module 1 fee will apply where it is taken as part of an extended motorcycling practical test. A premium charge will apply to all Module 2 tests taken out of hours.

8.5 Adopting a modular testing arrangement will generate some extra costs above the levels incurred to deliver the current practical motorcycle test, largely the costs of examiners to conduct Module 1 test (the other costs, particularly estate, having already been allowed for). We estimate, however, that we can deliver the modular testing service and break even financially over a 12 month period containing the overall fee at £90.50. Making the increase in October rather than the spring is likely to involve a deficit of £400,000 but we consider that we should honour public statements not to increase these fees again for 12 months. We can cover this deficit with the Agency's overall financial plan for 2009/10.

8.6 We propose to adopt as far as possible, the existing administration arrangements currently applying to the single event test (eg those relating to trainer booking).

- The cancellation period in which candidates may cancel or rearrange their test without a loss of fee will be three clear working days.
 - If you cancel your test at short notice for medical reasons (we need to see a letter or certificate from your doctor). This must cover the date of the test or a period including the test date.
- If DSA cancel the test within three clear days, except in bad weather, candidates may apply for payment of their out of pocket expenses.

8.7 Candidates or trainers will be able to :

- Book a Module 1 test and a Module 2 test. However, if the Module 2 test is cancelled (eg because Module 1 has not been passed) the normal cancellation provisions will apply.
- Book a Module 1 Test and, after it has been passed, then book a Module 2 test

8.8 We propose that candidates must pass the Module 1 test before they can take the Module 2 test. Motorcycling test candidates will have flexibility to book modules when it is convenient for them. Candidates must also hold a valid CBT certificate when taking each of the modules of the practical motorcycling test.

8.9 When a candidate has passed a Module 1 test they will be issued with a statement of performance. A valid statement of performance must be presented to the examiner before taking a Module 2 test. A full motorcycling licence will only be issued when a candidate has passed both modules of the practical motorcycling test.

8.10 Candidates must complete both modules using the same category of test vehicle; they will not be able to take Module 1 and Module 2 tests on different categories of motorcycle. The statement of performance issued as a result of passing Module 1 test will be marked with the category of vehicle with which the Module 1 test was taken. The examiner conducting the Module 2 test will confirm what category of vehicle was used for the Module 1 test before the Module 2 test can commence. If the candidate fails to produce a valid statement of performance the Module 2 test will be cancelled with a loss of fee.

8.11 The modular approach will allow for tests to be conducted from three types of site:

- Manoeuvring area/casual site – to conduct Module 1 tests only
- MPTC – to conduct Module 1 and Module 2 tests
- Driving test centre – to conduct Module 2 tests only

8.12 We hope to provide tests from around 100 locations; this will include around 60 sites that will have a manoeuvring area capable of conducting Module 1 tests. We shall continue to work with motorcycling interest groups concerning the number and location of the full range of testing facilities.

8.13 The introduction of a modular test would have implications for the extended test taken by some riders who have been “disqualified until extended test passed” by court order.

8.14 Under modular testing arrangements the extended test will comprise a standard length Module 1 test and a double length Module 2 test.

What is the current situation?

8.15 The current motorcycling test is conducted as a one part test of riding ability; comprising manoeuvring exercises and a road riding assessment.

Why are we proposing this change?

8.16 New EU standards require the introduction of higher speed manoeuvres into the practical motorcycling test. This results in an overall test event that is longer and more demanding, whether it is conducted as a singular event or as two modules. The government is committed to implementing EU Directives and raising standards of motorcycle riders. Representative organisations of the motorcycle community have raised concerns about the number and location of test centres delivering the new practical test and the inconvenience and poor customer service that riders who have to travel longer distances in order to take their motorcycling test would face. This proposal will allow DSA to uncouple the issues of finding suitable sites on which to conduct the new and more demanding test manoeuvres from the need to have locations close to suitable routes from which we can deliver the road riding element of the test.

8.17 The flexibility provided by splitting the test will allow for a greater utilisation of the current test centre estate. The test centres will be used to conduct modular tests allowing an improved level of customer service for motorcycling candidates and reduce the travel to test distance for some candidates. The single event practical motorcycling test due to be implemented on 30 March 2009 can only be conducted at centres that have a manoeuvring area and suitable test routes on which to conduct the road riding test.

How will the proposal be implemented?

8.18 We propose to take bookings for a modular practical motorcycling test from 30 March 2009.

PROPOSAL 2: Module 1 must be completed before a Module 2 test can be taken.

What will this mean?

8.19 A candidate must take and pass a Module 1 test before they are allowed take a Module 2 test. In order to take a Module 2 test the candidate must produce a valid statement of performance to the examiner to confirm they have passed the Module 1 test.

What is a statement of performance?

8.20 A statement of performance will be given to each candidate at the end of the Module 1 test. It will indicate whether or not the candidate has met the required standard for that element of the motorcycling practical test. It is not a test pass certificate. The test pass certificate will be issued only when the candidate has met the required standard for both Module 1 and Module 2 (ie the whole of the practical motorcycling test). Candidates who fail to meet the required standard in the Module 2 test will also be given a statement of performance for that module.

What is the current situation?

8.21 The practical motorcycling test is currently conducted as a single event.

Why are we proposing this change?

8.22 Module 1 will test the candidate's ability to control the motorcycle by completing a number of specified motorcycling manoeuvres. The candidate must prove that they have a sufficient level of skill in order to progress onto the Module 2 road riding test.

How will the proposal be implemented?

8.23 At the end of the Module 1 test the examiner will present each candidate with a statement of performance. Candidates will have to produce a valid statement of performance to the examiner confirming they have passed a Module 1 test before they can take Module 2.

PROPOSAL 3: Allow 24 months to complete modules 1 and 2 after passing the relevant theory test

What will this mean?

8.24 All motorcycling candidates will have 24 months after passing a relevant theory test to complete both practical motorcycling modules. If they fail to complete both modules in this time frame they will have to commence the process again i.e. pass the relevant theory test and complete both practical test modules in order to gain a full motorcycling licence.

What is the current situation?

8.25 Candidates have 24 months to complete the practical motorcycling test after passing a relevant theory test.

Why are we proposing this change?

8.26 This is a consequence of splitting the practical motorcycling test. We are proposing that a candidate should be required to demonstrate practical driving competence within a reasonable period of having successfully demonstrated theoretical knowledge. We believe that 24 months from passing the theory test represents such a period and it is the current practice.

How will the proposal be implemented?

8.27 It will be implemented by introducing legislation requiring both modular tests to be completed within 24 months of passing the relevant theory test. Candidates who have already taken and passed a theory test will have to complete both modules of the practical test before their theory test certificate expires.

PROPOSAL 4: Minimum waits before retaking a test

What will this mean?

8.28 The minimum wait before retaking a Module 1 test will be three clear working days and the minimum wait before retaking a Module 2 test will be 10 clear working days.

What is the current situation?

8.29 The minimum wait before retaking a single event motorcycling test is 10 clear working days. This has road safety benefits as it allows the candidate the opportunity to take further training before retaking the test.

Why are we proposing this change?

8.30 Adopting a three day wait before retaking a Module 1 test would ensure candidates and trainers had the opportunity to complete further training without risk of the trainer and trainee disengaging from the training process. The Module 2 test has parallels with the current motorcycling test so we propose to keep the current arrangement of 10 clear working days before a retake.

How will the proposal be implemented?

8.31 The new minimum waiting periods will become effective when a modular motorcycling test is introduced.

PROPOSAL 5: Test fee increase

What will this mean?

8.32 Our Business Plan⁶ proposed fee increases for the practical tests taken by learner motorcycle and moped riders from 1 April 2009. However, as higher fees for these tests were only recently introduced, we do not propose a further increase until October 2009.

8.33 We are proposing increasing the fee for the practical motorcycling test to £90.50 (standard weekday) with effect for tests taken on or after 5 October 2009, with consequential increase for out of hours testing.

8.34 However, if the test is modular as per proposal 1, the fee will be split as follows:

Test	New fee
Module 1: Specified motorcycling manoeuvres	
standard weekday	£15.50
standard out of hours	£15.50
Module 2: Road riding test	
standard weekday	£75.00
standard out of hours	£88.50
extended weekday	£150.00
extended out of hours	£177.00

⁶ DSA Business plan 2008/2009

What is the current situation?

8.35 The current fee for a standard weekday practical motorcycling test is £80. This was last increased in September 2008

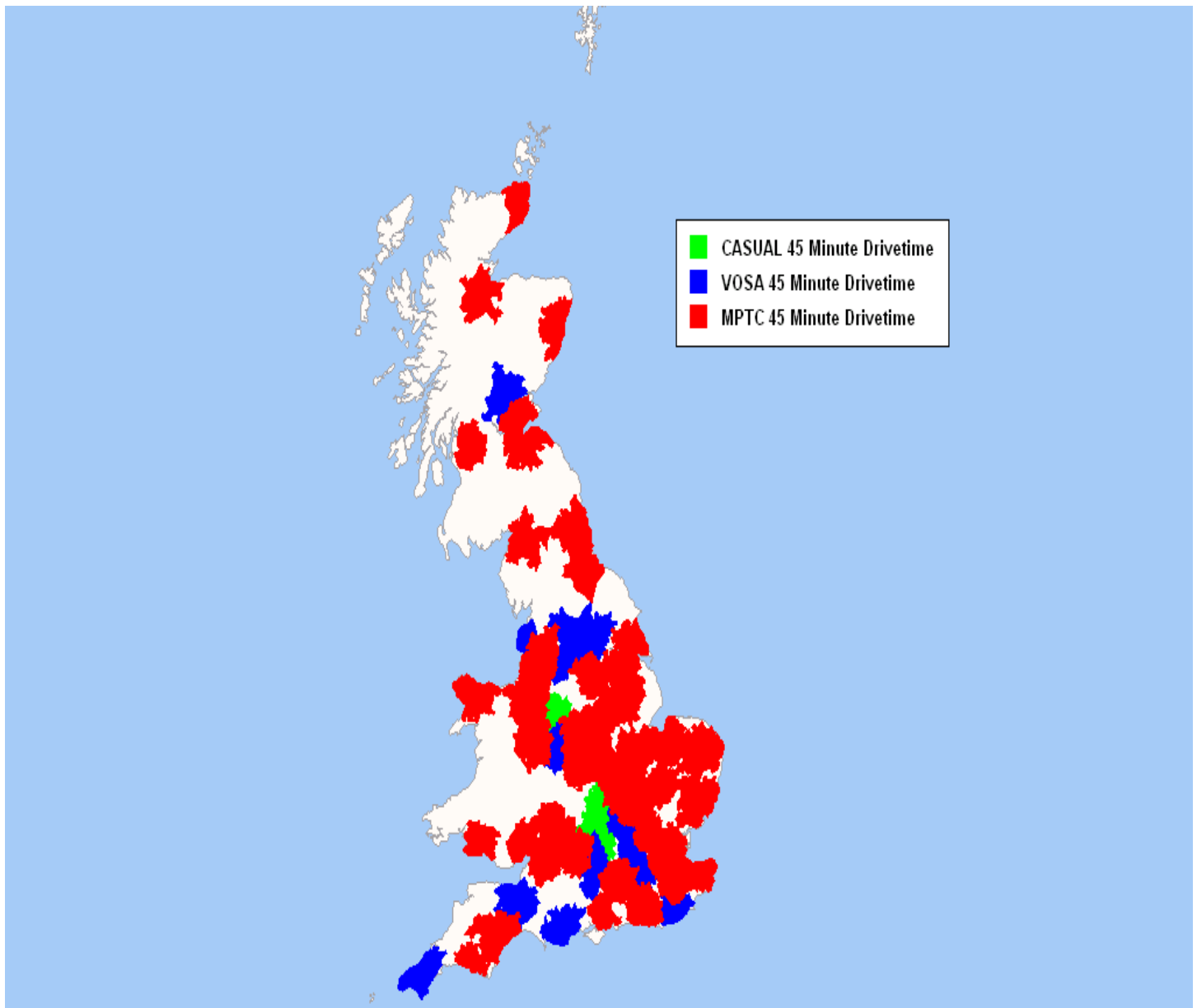
Why are we proposing this change?

8.36 If a modular test arrangement is implemented the test fee will be split between the modules. The overall fee will need to increase to address the increased costs of implementing a modular test. The fee was due to rise in April 2009 to contribute towards recovering the deficit on the motorcycling test account but has been delayed until October 2009.

How will the proposal be implemented?

8.37 The current £80 fee for the practical motorcycling test will be split from 30 March 2009 if the modular test is introduced. The higher fee of £90.50 for a standard weekday test will take effect for tests taken on or after 5 October 2009. Again, it will be split (i.e. Module 1 - £15.50 and Module 2 - £75.00) if a modular approach is adopted.

Likely coverage of sites to conduct module 1 tests on 30 March 2009



Summary: Intervention & Options

Annex C

Department /Agency:
Driving Standards Agency

Title:
Impact Assessment of 2008 New practical Motorcycling Test

Stage: Initial

Version: 1

Date: 21 October 2008

Related Publications: Consultation paper: Introducing the new practical motorcycling test and associated fees.

Available to view or download at:

<http://www.dsa.gov.uk>

Contact for enquiries: Rob Davies

Telephone: 0115 936 6213

What is the problem under consideration? Why is government intervention necessary?

The new practical motorcycle test was due to be implemented 29 September 2008 but with only 38 of the planned 66 new Multi Purpose Test Centres (MPTCs) operational. Following discussion with motorcycle interest groups it was decided to defer the implementation for 6 months. During this time DSA would investigate further alternative options to increase service coverage. DSA needs to address the stakeholder concerns over test provision coverage within the timetable commitment given to EU Commission.

On the 30 March there is expected to be 45 operational MPTCs and around 15 part time sites and DSA is identifying and considering options for additional sites on an ongoing basis.

What are the policy objectives and the intended effects?

To address stakeholder concerns by increasing coverage by providing more flexible site solutions rather than relying on the development of large MPTCs with adjacent suitable on-road test routes. Meet commitments to EU Commission for the new implementation date and minimise the risk of infraction proceedings.

Increase customer service level by giving flexibility and choice for people wanting to take a motorcycle test

Ensure that new arrangements are cost effective

What policy options have been considered? Please justify any preferred option.

Option 1 Continue with policy to implement the new practical test as a single element on 30 March using the expected estate of 45 MPTCs. This meets the secretary of state target but fails to address stakeholder concerns for service coverage.

Option 2 Develop and implement a modular motorcycling practical test. A modular test will enable DSA to be more flexible when looking for sites to conduct both elements of the new motorcycling test. A modular test will also give customers more choice and flexibility about how and where they want to take the test. This is in line with the approach in the recent Learning to Drive consultation exercise.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? There will be a review in 2013 to coincide with the implementation of the 3rd Directive concerned with graduated licencing.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

.....Date:

Summary: Analysis & Evidence

Policy Option:	Description: Develop modular motorcycling practical test
-----------------------	---

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' One-off costs relate to the trainer's potential investment in people carriers and trailers, IT Costs and Communications costs. Annual costs are the extra resource costs needed - examiners (£1.19m) and call centre (£60k).
	One-off (Transition)	Yrs	
	£ 3.6m	1	
	Average Annual Cost (excluding one-off)		
£ 1.25m	10	Total Cost (PV)	£ 14.34m
Other key non-monetised costs by 'main affected groups'			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Benefits relate to the savings made in the costs of testing (£21.84), mileage (£7.82) and time (£10.41) per candidate.
	One-off	Yrs	
	£ 0		
	Average Annual Benefit (excluding one-off)		
£ 3.33m	10	Total Benefit (PV)	£ 28.64m
Other key non-monetised benefits by 'main affected groups' Other benefits include greater flexibility and coverage in test sites, greater flexibility in training methods and course structure which will improve road safety, examiner feedback from module 1 improving chances of passing module 2, easier deployment of examiners and potential increased demand for motorcycles.			

Key Assumptions/Sensitivities/Risks

Price Base Year 2008	Time Period Years 10	Net Benefit Range (NPV) £ 14.3m	NET BENEFIT (NPV Best estimate) £ 14.3m
-------------------------	-------------------------	--	--

What is the geographic coverage of the policy/option?	Great Britain
On what date will the policy be implemented?	30/03/09
Which organisation(s) will enforce the policy?	DSA
What is the total annual cost of enforcement for these organisations?	£
Does enforcement comply with Hampton principles?	Yes/No
Will implementation go beyond minimum EU requirements?	Yes/No
What is the value of the proposed offsetting measure per year?	£
What is the value of changes in greenhouse gas emissions?	£
Will the proposal have a significant impact on competition?	N/A
Annual cost (£-£) per organisation (excluding one-off)	Micro Small Medium Large
Are any of these organisations exempt?	N/A N/A N/A N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	Net Impact £ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

Background

In October 2000 the European Commission adopted Directive 2000/56/EC that introduced higher standards for all driving tests. Implementation of the Directive was originally required by 2005, but the Commission agreed a deferment until 29 September 2008 (confirmed by directive 2008/65/EC) because of implementation difficulties faced by some Member States.

One of the higher standards introduced by the Directive was to require all motorcycle riders undertaking practical tests to carry out more demanding specified manoeuvres. The Directive, at Annex II, point 11 allowed each Member State to assess the manoeuvres on a "special testing ground".

The original consultation resulted in a single event test being the preferred option with a scheduled introduction date of 29/09/2008. Following representations from the motorcycle industry concerned about the shortfall in MPTC sites from where the single event test would be delivered, the option to introduce a modular two part test from 30/03/2009 is being considered.

The main aim of the directive was to improve the road safety for motorcyclists who have the highest fatality rate of all road users and account for 20% of all fatalities. In 2007 6,379 motorcyclists were killed or seriously injured.

The modular option will still fulfil this objective and will encourage new riders to prepare for the two module tests more thoroughly; they will in some cases also have a shorter distance to travel to take the test.

Modular testing has been proposed in Learning to Drive consultation and has already been developed as part of the Driver Certificate of Professional Competence.

Options

1. Introduce the new practical motorcycle test as a single event
2. Introduce the new practical motorcycle tests as a modular test

Option 1 Deliver a single event unitary test on March 2009 at the sites available at that date.

The single event test will compose of a special manoeuvres element and an on-road element which will be taken consecutively and based at the same location.

The table below gives estimated timings for a single event test:

Activity	New M/C Test (mins)
Meet and Greet Fit radio equipment Vehicle safety questions	8
Motorcycle special manoeuvres Exercises ⁷	10 – 13
Road Riding (Min 30 minutes)	30 – 33
Record assessment Give result and DSA 10 Recover radio Complete Documentation	9
Recovery time	5
Total Time (Minutes)	65

The motorcycle special manoeuvres test will be conducted at an MPTC, VOSA or casual site. The on-road element will be conducted immediately after the special manoeuvres element on approved test

⁷ This includes the time taken to wheel the motorcycle onto the off road area and the time to remove the bike from the area to the test centre bike park.

routes within close proximity of the test location. If the candidate is not able to prove they can reach the appropriate level of competency on the off-road area then they will fail the practical test but will have the option of continuing on to the on-road if it is deemed by the examiner safe to do so. If the candidate fails they will have to retake the whole test (at £80) for failing either element of the test.

Based on trials conducted with novice riders the pass rate for the special manoeuvres element was 64%. The existing practical motorcycle test which contains most of the aspects from the on-road element from the new motorcycle practical test has a pass rate of 65%

DSA have experienced significant difficulty in acquiring MPTCs that meet the requirement for an off road manoeuvring area and access to suitable meaningful test routes. Both are required to deliver a single event test. Up to the end of October 2008 704 sites had been visited, 286 (40.6%) have been rejected and 38 of the sites have been made operational. The majority of sites have been rejected after an assessment because of the location and lack of access to suitable test routes. Those which passed the assessment will have fallen through because of cost, developer lack of interest and planning etc.

Delivering tests from MPTCs and casual sites with suitable test routes restricts the number of sites and makes for an unequal distribution throughout the country. There are concerns from the motorcycle training industry that members without a local MPTC maybe disadvantaged if their potential customers elect to take CBT and full test training only at locations with an MPTC even if this means travelling and extra costs.

The single event is reliant on providing a manoeuvring area in a location which has a suitable on-road test route. This requirement has contributed to the difficulties finding sufficient sites leading to criticism from the press and the motorcycle industry. Motorcycle interest groups have supported the introduction of the test but subsequently raised numerous concerns about coverage. These have included safety of their candidates travelling long distances and the continued viability of some ATBs, who will not be close to a point of service. These concerns have led to the deferment of the test and pressure on DSA to improve the situation.

2. To develop and implement a modular motorcycle practical test – preferred option.

Delivering a modular test will provide DSA with greater flexibility identifying suitable sites. Sites for the special manoeuvres element will not need to be adjacent to suitable test routes. The on-road element could then be offered from a number of existing DTCs.

The modular test will comprise of 2 modules:

- Module 1 will essentially consist of the off road motorcycle special manoeuvres elements
- Module 2 will essentially consist of a road riding assessment

Candidates will need to have passed a module 1 test before being allowed to start a module 2 test.

From trials carried out with novice riders it is expected that the pass rate for module 1 will be 64%, module 2 is similar in format to the existing test which has a pass rate of 65%. Candidates will be able to retake their module 1 after 3 clear working days and module 2 after 10 clear working days, this is in line with current test policy and practise.

All candidates will have the following booking options:

- Book module 1 test then once completed successfully, book the module 2 test at a later date
- Book module 1 and module 2 tests on the same day (subject to availability), to be delivered from the same MPTC or site with suitable test routes
- Book module 1 and module 2 at the same time but for different dates.

The table below gives estimated timings for each module

Activity	Module 1	Module 2
Meet and Greet Fit radio equipment Vehicle safety questions	2	8
Motorcycle special manoeuvres Exercises ⁸	13	0
Road Riding (Min 30 minutes)	0	35
Record assessment Give result and DSA 10 Recover radio Complete Documentation	4.5	9
Recovery time	2.5	5
Total Time (Minutes)	22	57

DSA have regular project board meetings which include external stakeholders and held high level meetings with Motorcycle interest groups. The feedback from these consultations has been very positive towards modular testing.

The Motor Cycle Industry Association have written to DSA in support of modular testing:

“We strongly support the proposal to introduce modular testing as it will open up many more possibilities for test centres thus reducing the threat to our members’ livelihood. Modular testing has been seen by our members as a ray of light at the end of a dark tunnel. They have been reassured that the DSA is taking their views into account and they are very surprised and pleased by the level of understanding and the willingness to find a reasonable alternative that has been shown by the DSA since the implementation was delayed.”

Analysis of Impacts

Groups and Sectors

The main groups affected by changes to the delivery of the test will be the motorcycle Approved Training Bodies (ATBs), candidates taking the motorcycle test, motorcycle retailers and manufacturers. The modular test will have an impact across the whole of Great Britain.

Approved Training Bodies

There are approximately 800 ATBs authorised by DSA to provide the statutory CBT course. The ATBs vary in size from one person operators to large organisations with franchises around the country. These employ around 3500 approved motorcycle instructors.

80% of motorcycle test candidates undertake training and book their test through an ATB. Changing the delivery of the test to a modular approach will have a direct impact on the way the training organisations deliver their courses and could also affect the number of people prepared to learn to ride i.e. positively as it is safer and negatively as it is seen to be too complicated. Trainers will be affected by the location and number of points of service with additional costs for greater distances travelled. Those trainers that are closer to a point of service could be at an advantage to those further away.

If an ATB ceases to operate, because they are not close to a local testing facility, it could lead to a lack of motorcycle training provision in a particular area. Affected learners may not have access to Compulsory Basic Training (CBT), the statutory training requirement for all learner riders before they can ride on the road. In these circumstances novices would need to travel extended distances to take CBT and further training which could deter many from taking up motorcycle riding. Removing the ability to test effectively locally could make a business unviable and unprofitable.

⁸ This includes the time taken to wheel the motorcycle onto the off road area and the time to remove the bike from the area to the test centre bike park.

Candidates:

Test candidates are broken down into various groups; Moped, Learner legal 125cc motorcycles and larger motorcycles operating under the Direct Access Scheme. This latter category makes up some 80-85% of tests conducted.

The potential impact of changing the delivery of the motorcycle test could include:

- Distance travelled – How far a candidate will need to travel to a point of service whether that is travelling further to an MPTC for the single event test or possibly taking 2 shorter journeys for the modular test.
- Cost of training and hiring motorcycles – If the journey time is longer then costs for the candidate will increase for the hire of the motorcycle and paying for the trainer's time
- Cost of re-taking the test – Failing either element during a single event test will mean the whole fee is lost and the full fee would need to be paid for a re-test. Modular testing allows the candidate to lose, and pay for, only the fee relative to a particular module.
- Different approach to training methods – Better training methods will provide the candidate with improved riding skills and make them a safer rider.
- Increase in illegal riders – If acquiring a motorcycle licence is perceived to be too difficult or expensive this could lead to new trainees riding illegally. Similarly those that are able to complete CBT may increase the numbers who prefer to remain permanent learners, retaking CBT every 2 years.

Motorcycle Retailers and Manufacturers

This stakeholder group supports road safety initiatives whilst seeking to ensure that changes that are introduced do not deter new customers from motorcycling.

Consultation

DSA has representation on the new motorcycle test project board from the following motorcycle interest groups:

- MCIA – Motor Cycle Industry Association
- MRTA – Motorcycle Rider Training Association
- A representative from a non-affiliated Approved Training Body.

DSA have held various high level meetings with motorcycle interest groups to discuss how to improve coverage of the motorcycle test

- MRA – Motorcycle Retailers Association
- MCIA – Motor Cycle Industry Association
- MRTA – Motorcycle Rider Training Association

It has been clear during these consultations that external organisations are in favour of a modular test option.

Costs

Option 1 – Single Event Unitary Test

We currently forecast that 45 full MPTCs will be operational by 30 March 2009; these will result in 62% of the GB population being within 45 minutes of an MPTC; 83% within 60 minutes; and 97% within 90 minutes.

In addition, we will provide weekend testing only from between 14 and 20 part-time (weekend only) VOSA sites and additional mid-week testing from up to 3 casual-hire sites.

Whilst VOSA sites improve test coverage they will have limited availability and throughput of tests will be significantly less than at an MPTC. These sites will only be available on Saturday afternoons and Sundays and DSA are likely to experience difficulties securing voluntary examiner resource. Feedback from motorcycle trainers suggests they prefer to conduct CBT courses at weekends rather than tests. Therefore the vast majority of tests will be conducted at MPTC or Casual sites.

A single event test will not allow for flexibility in test delivery and will mean that candidates, in the main, will have to travel to their nearest MPTC. We have received feedback from motorcycle organisations and training groups that due to gaps in coverage some candidates could travel for 2 hours or more each way to conduct their test which has led to safety concerns being raised.

Around 80% of motorcycle test candidates are accompanied to the test centre by an approved trainer, under the requirements of the Direct Access Scheme. Longer journeys for candidates will mean higher costs to pay for the additional time the trainer has to be with the candidate and for possible hire of the motorcycle. The motorcycle trainer may try to reduce costs by taking up to 4 candidates but as the manoeuvring area can only accommodate one test at a time this may be impractical as each candidate would have to wait while each rider conducts their test.

To utilise the area efficiently there are staggered test times during the day for up to 4 examiners. This is not very flexible and means that it is difficult to integrate with other test work programmes

Option 2 – Modular Version of the Test

The customer will have the opportunity of taking the test modules on separate days or together at the same site. If the candidate chooses to take the test on separate days then they will travel to a test centre twice. This will mean that although they are shorter journeys the distance covered may be greater.

The length of journey will depend on the coverage in their area. Modular testing will allow a greater number of sites to be developed and give DSA the opportunity of providing better coverage.

A transition to a modular test approach would provide an opportunity to increase the points of delivery for both modules. The expectation is that there will be 100 points of service which will include at least 60 sites with a manoeuvring area.

Modular testing gives a trainer the opportunity of taking more than two candidates at a time to a test centre. The module 1 test is particularly suited to this as it is shorter and more can be conducted in a day. To facilitate this it may be necessary for trainers to purchase a minibus and trailer to transport more than two candidates and a motorcycle to the test centre.

Trainer costs

For the purpose of this exercise, the average cost of purchasing a minibus and trailer are assumed to be as follows:

Cost of minibus = £15,000

Cost of trailer = £800

Test Fee

When the modular test is implemented the fee will remain at £80. An increase is planned for October 2009 and is included in a separate impact assessment.

DSA Costs

IT Changes

IT changes will have to be made to ensure that modular tests can be booked and to enable results to be captured.

Changes to Booking System (DTCS-T)	£12,000
Changes to Internet Booking System (IBS)	£9,000
Changes to Scanning to capture results	£73,000
Total Cost of Implementing IT Changes	£94,000

Staff Resource

Examiner Costs (per annum)

Single event test examiner resource	79
Examiner Resource for Module 1	67
Examiner Resource for Module 2	34
Total Examiner resource for Modular test	101
Additional Examiners	22
Examiner Cost Summary	£741,633
Examiner Overheads	£444,980
Total Examiner and Related Costs	£1,186,613

Contact Centre Costs (per annum)

Total staff resource cost	3682610
Call volumes	2000000
No bike tests	83000
Percentage bike tests booked by phone	79%
Expected additional time	50%
Total Additional Cost for modular testing	£60,367

Communications (one- off cost)

Information pack and DVD	£29,000
Posters and Leaflets	£1,200
ATB Events	£600
Focus Group Events	£3,400
Total	£34,200

Benefits

Modular Testing

Explanation of financial information

Four motorcycle trainers who are part of DSA's regular informal stakeholder group were contacted for assistance in compiling the information. They are representative of trainer groups from across the UK and are based in Scotland, the midlands, inside the M25 and Kent.

In each case they were asked what they anticipated the costs or benefits of modular testing would be and to give an indication of the financial implications.

Some background information from DSA's road safety information system, RSIS, has been used. Independent trials were carried out by Transport Research Laboratory (TRL) of the special motorcycle manoeuvres; information on the pass rate of these trials has also been used in this report.

Three different models have been used to establish the likely costs and benefits:

- Single event test where the trainer travels by bike with two trainees to one location to take the single event test.
- Modular test with part of the transport arrangements involving a people carrier and trailer to transport the trainer, up to six trainees and two or more bikes to the module 1 event.
- Modular test with all training and transport carried out bike to bike at a 2:1 ratio.

We understand that 40% of the 800 Approved Training Bodies (ATBs) will have to travel further than 45 minutes or 20 miles to an MPTC. This group may consider using car and trailer transportation; It is assumed that approximately 1/3 of ATBs may already have some form of four wheel transport and trailers for recovering motorcycle breakdowns.

The number of motorcycle tests was estimated to be 83,000 based on previous years demand.

Table 1 Shows the costs associated with a typical motorcycle training course structure based on a modular test with the trainer using a car and trailer to transport trainees and bikes to the manoeuvring area. This could enable a higher trainer: trainee ratio to travel to and from the test than the 1:2 ratio typically used when all parties are riding motorcycles.

Table 1			
Typical course structure		Modular	
Based on trailer use for Mod 1			
4 days training		£ 655.00	4 x daily rate
1/2 day Mod 1 test		£ 27.26	0.5 daily rate x 0.333 (6:1 Vs 2:1)
Mod 1 Test Fee		£ 26.50	
Mod 1 mileage cost		£ 26.40	car trailer cost
Mod 1 travel time		£ 15.13	travel time cost x 0.333
Mod 1 Candidates Travel time		£ 2.82	
1/2 day Mod 2 test		£ 81.88	0.5 * daily rate
Mod 2 Test fees		£ 53.50	
Mod 2 mileage cost		£ 1.56	bike cost
Mod 2 travel time		£ 9.96	travel time cost
Mod 2 Candidate travel time		£ 1.86	
Total		£901.87	

Table 2 Shows a typical course structure for a modular test with training carried out bike to bike with no alteration in training ratios, all travel by motorcycle.

Table 2			
Typical course structure		Modular	
Based on 2:1 bike to bike for Mod 1 & Mod 2 on same day			
4 days training		£ 655.00	4 x daily rate
1 day Mod 1 & 2 test		£ 163.75	0.5 daily rate
Mod 1 and 2 Test fee		£ 80.00	
Mod 1 & 2 mileage cost		£ 47.52	
Mod 1 & 2 travel time		£ 45.44	travel time cost
Mod 1 & 2 Candidate travel time		£ 8.47	
Total		£1000.18	

Table 3 Shows a typical course structure for a single event test. All training bike to bike at a 2:1 ratio. This is the Business as Usual Scenario.

Table 3			
Typical course structure		Single event	

4 days training	£	655.00	4 x daily rate
1 day test	£	163.75	1 x daily rate
Test Fee	£	80.00	
Mileage cost	£	47.52	3 x bike travel mileage
Assessor Travel time	£	45.44	travel time cost
Candidate travel time	£	8.47	
		£1000.18	

Table 4 Shows the net difference comparing modular test training to single event test training, the all candidates figure is based on 83,000 tests per annum

Table 4		
Net difference Modular (using trailer on module 1) versus Single Event		
Single Event		£ 1000.18
Modular with trailer		£ 901.87
Per candidate		£ 98.31
All candidates		£ 8,159,912.04

Table 5 Shows the net difference of a modular test with training carried out bike to bike compared to a single event test.

Table 5		
Net difference Modular same day versus Single Event		
Single Event		£ 1000.18
Modular (bike to bike)		£ 1000.18
Per candidate		£ 0
All candidates		£ 0

Table 6 Shows Costs for a candidate undertaking the modular tests based on 40% of trainers opting to use a people carrier and trailer.

Table 6		
Option 2		
Training		£ 655.00
Testing		£ 141.91
Average Mileage Cost		£ 39.70
Test Fee		£ 80.00
Assessor's Time		£ 37.30
Candidate's Time		£ 6.20
TOTAL		£ 960.10

Table 8 Shows Total Annual Savings for a candidate conducting a Modular Test

Table 8		
Savings	p/candidate	Total Annual Savings
Training	£ -	£0.00
Testing	£ 21.84	£1,813,072.75
Average Mileage Cost	£ 7.82	£649,392.00
Test Fees	£ -	£0.00
Assessor's Time	£ 8.14	£675,534.96
Candidate's Time	£ 2.27	£188,728.13
Total		£3,326,727.84

Non-monetised Benefits

Option 1

The single event test was ready to be implemented September 2008 and bookings were taken for the new test before the deferment was agreed. The infrastructure and procedures are in place and little or no additional expenditure or effort would be required.

The single event test will mean that the candidate will have to make one booking and will have one event to attend.

Option 2

Sites and coverage

- A modular test allows for greater flexibility for identifying sites to deliver the practical motorcycle test by removing the requirement to have adjacent suitable test routes.
- A single event test would mean that a permanent site would still need to be found for every proposed search area which could take a considerable amount of time and resource.
- VOSA sites could be utilised more efficiently by conducting only module 1 tests to increase the throughput and make better use of the available examiner resource.

Having better coverage will make journey times shorter to each of the test centres and reduces the inconvenience to the candidate. This has consistently been the major issue raised by the motorcycle industry and press.

Modular testing also allows DSA to look at various schemes to help trainers and candidates if their test centre is further away such as providing trailers and garaging facilities for ATB motorcycles.

Trainers

Current training and testing arrangements encourage a test driven approach. Adopting the modular approach would encourage a more needs and competency driven approach to training methods. This in turn should result in new riders being better equipped to deal with the very real risks they face in their first years of riding. Delivering a modular test may reduce the reliance on intensive courses and would give greater choice and flexibility of training methods and course structure. Courses could be focussed more on teaching needs rather than a one size fits all. This modular approach to training currently forms part of the learning to drive consultation and experience from across other educational areas shows that modular approaches to learning are more efficient ways to communicate subject matter.

Many trainers have registered concerns over the distance some novice riders would be required to travel to complete a single event test at a MPTC; the modular approach would resolve many of these concerns as greater flexibility in training and testing arrangements would be available to candidates and trainers alike.

These changes to the way the training is delivered should improve road safety and save lives. The motorcycle casualty rates are the highest amongst road users; improving the riding skills of motorcyclists is a key aspect of the Government's Motorcycle Strategy. The cost of a road fatality is in the region of £1.5m, the emotional and social consequences are far higher, therefore any reduction in the fatality rates has substantial benefits

Candidates

The candidate would be able to choose to take the two modules separately, this allows them to "pay as they go", or to take both modules on the same day. Under single event testing arrangements failure of the special motorcycle manoeuvres would result in the candidate having to pay the full single event fee. Adopting a modular approach would mean they only lose part of the fee. If both modules are booked within the 3 day cancellation period it will mean they will be liable for the whole test fee if they fail the first module. Initial indications from the training industry they will book module 1 and module 2 far enough apart to avoid loss of the module 2 fee.

Modular testing gives candidates the chance of receiving feedback from the first module and the opportunity to re-assess their training needs. This helps make the training and course more appropriate to the needs of the individual.

DSA

Adopting a modular approach to testing, as opposed to providing a single event test, would remove constraints around examiner utilisation and accommodate a more efficient approach. Tests would not need to operate at complex, staggered times, as previously planned for the single event test, as examiners would be fully occupied delivering module 1 only tests. This would enable greater flexibility to, where required, integrate examiners with other categories of testing within the same daily programme. Therefore an impact of the additional length of time required for modular testing is mitigated by creating the greater flexibility to enable examiners to be scheduled more effectively.

Manufacturers, Retailers and Small Firms

A more demanding test combined with better training practises will reduce motorcycle accident rates and improve the perception of motorcycle riding to the public.

The proposal to use a modular approach for the practical motorcycling test will increase the points of delivery helping those smaller businesses and training bodies which could have been further away from a single event testing facility. The Motor Cycle Industry Association support the introduction of modular testing as they feel that with extra service provision it will reduce the threat to their member's livelihoods especially those which are small businesses.

Rural proofing

The proposal to split the practical motorcycling test into a modular format will positively impact on those living in rural areas. The implementation of the new practical motorcycling test as a single event would have meant that some candidates would have had to travel long distances in order to take a test at a MPTC. The modular test will help provide a wider range of testing facilities and aims to reduce the distance with which candidates have to travel to test centres.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	Yes	No
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	No	No
Rural Proofing	Yes	No

This page left intentionally blank.

Summary: Intervention & Options

Annex C

Department /Agency: Driving Standards Agency (DSA)	Title: Impact Assessment of increasing fees of the practical test for motorcycles and mopeds	
Stage: Consultation	Version: 11	Date: 17 November 2008
Related Publications: Consultation paper: Introducing the new practical motorcycling test and associated fees		

Available to view or download at:

<http://www.dsa.gov.uk>

Contact for enquiries: Nick Taylor

Telephone: 0115 9366092

What is the problem under consideration? Why is government intervention necessary?

The income received from practical motorcycling tests will not meet the increased costs of providing the tests in future and there is an existing deficit on the motorcycling account to address. Government intervention is necessary as the provision of practical motorcycling tests is prescribed in legislation.

What are the policy objectives and the intended effects?

To ensure the costs of delivering the practical motorcycling test are fully covered by the income received. The test fee should comply with HM Treasury "user pays" principle.

What policy options have been considered? Please justify any preferred option.

1. Maintain DSA's fees at 2008 levels. This would create an adverse financial impact which would involve either a reduction in the number of examiners or test centres or both, leading to increased waiting times or increased journey times for tests. This option is not acceptable to key stakeholders.
2. Increase the fee and conduct a single event test. The fee would be set to recover costs and the productivity loss that would occur due to the reduction to 6 tests per day and to recover full costs and overheads of the activity.
3. Increase the fee and conduct a modular test. Fees would be set to recover the full cost of the road riding element of the test and on a marginal basis to recover the manoeuvres element of the test

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? The level of the practical motorcycling test fee will be reviewed within 12 months of implementation as part of the agency's business planning process.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

.....Date:

Summary: Analysis & Evidence

Policy Option: 1

Description: Maintain DSA fees at 2008 levels

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' There are no direct costs associated with this option. The non monetised costs are described below.
	One-off (Transition)	Yrs	
	£		
	Average Annual Cost (excluding one-off)		
	£		Total Cost (PV) £
Other key non-monetised costs by 'main affected groups' 1. Degradation in customer service levels. 2. No further service coverage could be provided. 3. The current deficit would not be addressed.			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' No benefits result from this option
	One-off	Yrs	
	£		
	Average Annual Benefit (excluding one-off)		
	£ 0		Total Benefit (PV) £ 0
Other key non-monetised benefits by 'main affected groups'			

Key Assumptions/Sensitivities/Risks

Price Base Year 2008	Time Period Years 1	Net Benefit Range (NPV) £	NET BENEFIT (NPV Best estimate) £
-------------------------	------------------------	-------------------------------------	---

What is the geographic coverage of the policy/option?	GB			
On what date will the policy be implemented?	1/10/2009			
Which organisation(s) will enforce the policy?	DSA			
What is the total annual cost of enforcement for these organisations?	£ 0			
Does enforcement comply with Hampton principles?	Yes/No			
Will implementation go beyond minimum EU requirements?	N/A			
What is the value of the proposed offsetting measure per year?	£			
What is the value of changes in greenhouse gas emissions?	£			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)	
Increase of	£ 0	Decrease of	£ 0
		Net Impact	£ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Summary: Analysis & Evidence

Policy Option: 2

Description: Increase the fee to a level that contributes to reducing the deficit on the motorcycling test account with a single event test

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Marginal increase in revenue (Normal test) = £801,000 Marginal increase in revenue (Out of hours test) = £9,000	
	One-off (Transition)	Yrs		
	£			
	Average Annual Cost (excluding one-off)			
	£ 810,000		Total Cost (PV)	£ 810,000
Other key non-monetised costs by 'main affected groups'				

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Marginal increase in revenue (Normal test) = £801,000 Marginal increase in revenue (Out of hours test) = £9,000	
	One-off	Yrs		
	£			
	Average Annual Benefit (excluding one-off)			
	£ 810,000		Total Benefit (PV)	£ 810,000
Other key non-monetised benefits by 'main affected groups'				

Key Assumptions/Sensitivities/Risks i) Motorcycling test would be conducted from planned estate of MPTCs and no further service coverage could be provided.ii) Stakeholder concerns regarding the location and availability of motorcycling test facilities not addressed.iii) Does not support modular approach to learning and testing outlined in Learning to Drive

Price Base Year 2008	Time Period Years 1	Net Benefit Range (NPV) £	NET BENEFIT (NPV Best estimate) £
-------------------------	------------------------	-------------------------------------	---

What is the geographic coverage of the policy/option?			GB	
On what date will the policy be implemented?			1/10/2009	
Which organisation(s) will enforce the policy?			DSA	
What is the total annual cost of enforcement for these organisations?			£ 0	
Does enforcement comply with Hampton principles?			Yes/No	
Will implementation go beyond minimum EU requirements?			N/A	
What is the value of the proposed offsetting measure per year?			£	
What is the value of changes in greenhouse gas emissions?			£	
Will the proposal have a significant impact on competition?			Yes/No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	Yes/No	Yes/No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)			(Increase - Decrease)		
Increase of	£ 0	Decrease of	£ 0	Net Impact	£ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Summary: Analysis & Evidence

Policy Option: 3

Description: Increase the fee to a level that contributes to reducing the deficit on the motorcycling test account, with a modular test.

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Module 1 tests (60,000) = £330,000 Module 2 test (Normal test) (89,000) = £445,000 Module 2 test (Out of hours) (1,000) = £6,500
	One-off (Transition)	Yrs	
	£		
	Average Annual Cost (excluding one-off)		
	£ 781,500		Total Cost (PV) £ 781,500
Other key non-monetised costs by 'main affected groups'			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' Module 1 tests (60,000) = £330,000 Module 2 test (Normal test) (89,000) = £445,000 Module 2 test (Out of hours) (1,000) = £6,500
	One-off	Yrs	
	£		
	Average Annual Benefit (excluding one-off)		
	£ 781,500		Total Benefit (PV) £ 781,500
Other key non-monetised benefits by 'main affected groups' A modular test will allow for an improved level of customer service and support the modular approach outlined in the Learning to Drive Consultation. This option would eliminate the in-year deficit but does not address previous accumulated deficits or the additional cost impacts associated with the modular test			

Key Assumptions/Sensitivities/Risks Moving to a modular testing system comes with the risk of decreasing productivity and changes to the systems, booking and certification and documentation development costs. These are addressed in a separate IA

Price Base Year 2008	Time Period Years 1	Net Benefit Range (NPV) £ 0	NET BENEFIT (NPV Best estimate) £ 0
-------------------------	------------------------	--	--

What is the geographic coverage of the policy/option?			GB	
On what date will the policy be implemented?			1/10/2009	
Which organisation(s) will enforce the policy?			DSA	
What is the total annual cost of enforcement for these organisations?			£ 0	
Does enforcement comply with Hampton principles?			Yes/No	
Will implementation go beyond minimum EU requirements?			N/A	
What is the value of the proposed offsetting measure per year?			£	
What is the value of changes in greenhouse gas emissions?			£	
Will the proposal have a significant impact on competition?			Yes/No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)			(Increase - Decrease)	
Increase of	£ 0	Decrease of	£ 0	Net Impact £ 0

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Evidence Base (for summary sheets)

Our best judgement is that this scheme delivers costs to the UK without cost to Government. The cost of such tests is met by the candidates themselves. There is no burden on business or the voluntary sector.

Description of the scheme

DSA proposes to implement increases in fees for statutory motorcycling practical tests for tests taken on or after 5 October 2009. Individual fee increases will depend upon the outcome of the separate proposal to implement a modular approach to motorcycling testing and we have prepared a separate impact assessment.

If the motorcycling test remains as a single event, the Agency proposes to increase the fees from £80.00 to £89.00 for weekday tests and from £92.00 to £101.00 for out of hours tests from 5 October 2009. (Option 2)

If a modular motorcycling test is implemented, the existing £80 standard test fee would be split £10 for module 1 tests and £70 for modular 2 tests from commencement of the 2 part test. This follows from the previous increase from £60 to £80 in October 2008 which was originally based upon a £10 general fee increase and a £10 loss in productivity. Had the Agency planned for a 7 test day at that stage a £70 fee would have been charged.

If a modular motorcycling test is implemented it is proposed increased fees for test taken from 5 October 2009 would be:

- Module 1 (Specified manoeuvres test) would increase from £10.00 to £15.50 (weekday and out of hours)
- Module 2 (road riding test) would increase from £70.00 to £75.00 for standard weekday tests and from £82.00 to £88.50 out of hours tests. (Option 3)

Background

Fees are set to recover the full cost of delivering the service. The projected cost of delivering these services has taken account of the following:

- Direct costs - such as the salary of an examiner conducting the test
- Indirect costs - such as the accommodation, training and supervision of the examiner conducting the test
- Direct overheads - such as operational support activities
- Indirect overheads - such as Finance, Human Resources, Information Communications & Technology, Executive and Policy cost
- Return on Capital – impact of achieving 3.5% cost of investment

The cost of such tests is generally met by the candidates themselves.

The likely volumes of tests are based on published business plan volumes that take into account historic trends as adjusted for re-forecasts, demographic and underlying changes in business processes where appropriate. In some cases the projected volumes have been above what has been forecast. This has at times resulted in a surplus for particular fees. Where this has occurred we have limited increases the following year to run down surplus revenue and/or utilised it to fund provision of road safety information schemes such as 'Arrive Alive'.

Why do we need to increase the fees for the practical tests taken by learner motorcycle and moped riders?

The motorcycling practical test account currently has a significant deficit. This has risen to £4.2m as at March 2008. The account has been brought into balance during the 2008-09 financial year following an increase in fees from October 2008, however costs for the resources involved in conducting the manouvers element of the test are yet to be incurred. DSA cannot allow motorcycling tests to be subsidised by the customers of other test types.

Reducing DSA costs to bring the account into balance would require substantial reductions in service standards and test centre coverage. This would increase waiting times and the distance that customers would need to travel to their test and would be unacceptable to stakeholders.

The Agency has considered the following options:

Option 1 - Do nothing and operate a single event test with fees at the existing level of £80 per test

Option 2 - Retain a single event test and increase the fee to £89.00 per test

Option 3 - If a modular motorcycling test is introduced, increase the overall test fee to £90.50, apportioned between the two modules - this is the preferred option.

Option 1 - Do nothing and operate a single test event at the existing level of £80 per test

Under this option the test would remain as a single event and the fee would stay at £80 per test.

This option is not feasible as it would present a number of fundamental concerns:

- Major financial issues for DSA would result in a significant degradation in customer service levels. This may result in test centre closure.
- The motorcycling test would be conducted from the existing estate of MPTCs and no further service coverage could be provided.
- It would not reflect the HM Treasury “user pays” principle
- It will not address the current deficit or the likely additional deficit in 2009/10. This would mean that the deficit on the motorcycling test account would increase and would require subsequent steep increases.
- This option would require cross subsidy by other fee payers.
- This does not address stakeholder concerns regarding the location and availability of motorcycling test facilities.
- This option would not support the modular approach to learning and testing outlined in the recent *Learning to Drive* Consultation paper.

Benefits

There are no foreseeable benefits for the consumer of maintaining the current fee structure – as this is the business as usual scenario.

Option 2 - Increase the fee to £89.00 per test and operate a single event test.

In the DSA Business Plan for 2008/09, we estimated that a single event test would increase from £80 per test to £90.50 per test from 1 April 2009. This was the best estimate at that time and based upon a single event test conducted by examiners able to deliver 6 tests per day.

The Agency has further reviewed the cost of the motorcycling practical test fee. The actual cost of the activity as published in the 2007-08 Annual report and Accounts was £7,214,000 before interest and capital costs, equivalent to a cost per test of £76.66. The deficit incurred in-year amounted to over £1.6m, bringing the accumulated deficits to almost £4.2m.

Cost pressures continue from the implementation and operational costs of the Multi Purpose Test Centre project as the number of operational sites increased throughout 2007-08 and 2008-09. The impact of the lost productivity from a planned single test event, based upon a 6 test examiner day, will be incurred from the commencement of the new motorcycling test from April 2009.

The delayed test fee increase commencing October 2009 will be 6 months later than envisaged in the business plan, the average price inflation as measured by RPI/CPI has averaged around 5% per annum. Additionally the Agency has increased quality assurance activities and needs to continue funding of policy initiatives such as the Government Motorcycle Strategy.

In order to recover the expected costs of a single event test in the 12 months period from October 2009, the Agency has calculated the need for an increased test fee of £89 for normal weekday tests and £101 for out of hours tests. An extended test will cost £178 weekday and £202 out of hours.

Costs

A detailed breakdown of the fee increases based upon single test event is as follows:

	2007-08 <i>actual</i>	2008-09 <i>estimate</i>	Apr - Sept 2009 <i>estimate</i>	12 mths to Sept 2010 <i>estimate</i>
Volume of total fee earning transactions expected (number)	94,079	99,530	45,000	90,000
Normal/Out of Hours Fees (£)	£60/£70	£80/£92	£80/£92	£89/£101
Fee income from service (before proposed increase) (£k)	£5,607	£6,650	£3,600	£7,200
Increased income from new/revised fee (£k)				£810
Operating budget for service (before input price increases and any other added expenditure) (£k)	£7,214	£6,588	£3,294	£6,589
Additional costs of providing service:				
Volume			-£158	-£315
Inflation 3% pa			£94	£282
Productivity loss				£1,143
Other			£139	£278
Interest/GIBS/ROCE	-£2	£38	£13	£25
Net surplus / (deficit) for service in year (£k)	-£1,605	£24	£218	£8
Accumulated surplus / (deficit) brought forward from previous period (£k)	-£2,582			
Net surplus / (deficit) for service at year end (£k)	-£4,187	-£4,163	-£3,944	-£3,936

This option raises the following concerns.

- The motorcycling test would be conducted from the planned estate of MPTCs and no further service coverage could be provided.
- It does not address stakeholder concerns regarding the location and availability of motorcycling test facilities.
- This option would not support the modular approach to learning and testing outlined in the recent *Learning to Drive* Consultation paper.

Benefits

This option would eliminate the in-year deficit but does not address previous accumulated deficits but better reflects the 'user pays' principle for the in-year position.

Option 3 - Increase the overall test fee to £90.50 per test, apportioned between the two modules and operate a modular test – this is the preferred option.

With effect from 5 October 2009, the proposed fees for the practical motorcycling test modules are:

Test	New fee
Module 1: Specified motorcycling manoeuvres	
standard weekday	£15.50
standard out of hours	£15.50
Module 2: In-traffic riding assessment	
standard weekday	£75.00
standard out of hours	£88.50
extended weekday	£150.00
extended out of hours	£177.00

The out of hours testing fee for Module 1 is proposed at the same level as the weekday test fee to reflect that, in the short term, site coverage in some areas may only be available out of hours and therefore present a necessity rather than a customer choice. The DSA will review this policy as site coverage improves and may propose a higher out of hours Module 1 test fee from October 2010.

The out of hours fee for the Module 2 test has been proposed at the same marginal level as applied to the practical car test fee. This represents additional cost of overtime and travelling incurred by providing examiner resources outside of normal working times. Module 2 test availability is not limited by location in the same way as Module 1 and therefore customer choice is the main determining factor.

These increases have not taken account of the historic deficits accumulated on this activity which have built up over a number of years. We will review the cost allocation model further before deciding how these costs should be recovered from fee payers and over what period.

Costs

A detailed breakdown of the fee increases for a modular test is as follows:

	2007-08	2008-09	Apr - Sept 2009
	<i>actual</i>	<i>estimate</i>	<i>estimate</i>
Volume of total fee earning transactions expected (number)	94,079	99,530	45,000
Normal/Out of Hours Fees (£)	£60/£70	£80/£92	£80/£92
Fee income from service (before proposed increase) (£k)	£5,607	£6,650	£3,600
Increased income from new/revised fee (£k)			
Operating budget for service (before input price increases and any other added expenditure) (£k)	£7,214	£6,588	£3,294
Additional costs of providing service:			
Volume			-£158
Inflation 3% pa			£94
Productivity loss			
Other			£139
Interest/GIBS/ROCE	-£2	£38	£13
Net surplus / (deficit) for service in year (£k)	-£1,605	£24	£218
Accumulated surplus / (deficit) brought forward from previous period (£k)	-£2,582		
Net surplus / (deficit) for service at year end (£k)	-£4,187	-£4,163	-£3,944

12 mths Oct 2009-Sep 2010		
Module 1	Module 2	Total
60,000	90,000	150,000
£15.50	£75.00/£88.50	
£600	£6,300	£6,900
£330	£450	£780
£872	£6,589	£7,461
	-£315	-£315
£39	£282	£322
		£0
	£278	£278
	£25	£25
£19	-£109	-£90
		-£4,034

Benefits

This option addresses stakeholder concerns about the implementation of the new motorcycling test, the benefits of this are addressed in the separate Impact Assessment. A modular test will allow for an improved level of customer service and support the modular approach to learning and testing outlined in the recent *Learning to Drive* Consultation paper.

Cost impact associated with modular testing

The move to a modular test will have a number of impacts and considerations:

- The fees for Module 1 have been calculated on a marginal cost basis assuming that a maximum of 14 tests per day are conducted. Marginal costs are those incurred as a direct result of conducting the test activity such as the:
 - salary costs of the examiners;
 - costs of taking the booking,
 - test materials and equipment
 - recovery over time of the one off costs associated with implementing the new test such as systems and publicity costs. For example there will be development costs associated with new contact centre procedures and booking guidance

By costing Module 1 on this basis, the fee is lower than it would otherwise be if all fixed costs (such as the estate costs) were taken into account. These will be recovered on Module 2 as explained below. This helps compensate customers for the potentially higher cost of travel associated with the site coverage provided by the planned off road manoeuvre areas and will therefore make the proposition more attractive to candidates.

- Module 2 of the test shares testing resources with the practical car test. These costs are both fixed and variable in nature. We have used these known costs of the car practical test as the basis for calculating the cost of Module 2 of the proposed motorcycle test. We have calculated the fee by adding the direct costs associated with the motorcycle element (direct costs of the bike, clothing, radios, skills allowances etc. estimated as an additional £11.50 per test) to the base costs for conducting a standard 7 slot per day test. The fee for Module 2 is therefore calculated on a full cost basis recovering the full range of DSA overheads. This is in line with DSA's normal costing methodology. There is no productivity loss associated with Module 2 because the same number of tests per day (7) are anticipated.

Other additional costs and risks that remain unquantified and uncertain at this time include:

- Overall changes in pass rates and how these impact on the volumes of tests for each module; assumptions have been made in the costing of both modules however actual results may differ.
- Final costs of the estates implications of a changed approach e.g. whether additional costs will fall more specifically on motorcycling test fees
- Lost productivity of examiners and the motorcycle fleet that may result from mixed programmes and increased in-traffic testing locations.

Equality, Environmental and Social (Health) Impacts

We have conducted initial screening tests on the grounds of:

- Competition Assessment
- Small Firms Impact Test
- Legal Aid
- Sustainable Development
- Carbon Assessment
- Other Environment
- Health Impact Assessment
- Race Equality
- Disability Equality
- Gender Equality
- Human Rights, and
- Rural Proofing

We have not identified any adverse effects resulting from this proposal in respect of the category areas mentioned above.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

CONSULTATION LIST

We have written to the following organisations informing them of this consultation exercise

<p>AA (Motoring Services) AA – The Driving School ADI Federation Ambulance Service Association Approved Driving Instructors National Joint Council Association of British Insurers ACPO ACPO (Scotland) Assoc. of Industrial Road Safety Officers Association of Magisterial Officers Big Wheelers Brake British Telecom British Motorcyclists Federation BSM Ltd British Red Cross Chief Fire Officers Association Civil Service Motoring Association Commission for Racial Equality (England, Scotland and Wales) Confederation of British Industry Confederation of Passenger Transport Convention of Scottish Local Authorities CTC Disabled Drivers' Association Driving Instructors Association Driving Instructors Democratic Union Driving Instructors Scottish Council Eddie Stobart Ltd Freight Transport Association GoSkills Guild of Experienced Motorists IAM Foundation Institute of Road Safety Officers Justices' Clerks' Society Learn and Live Learning and Skills Council Local Authority Road Safety Officers Association Local Government Association London Borough Councils (14) Magistrates' Association MIDAS Ministry of Defence Motor Schools Association of GB Ltd Motorcycle Action Group UK Motorcycle Industry Association Motorcycle Retailers Association Motorcycle Rider Training Association</p>	<p>National Association of Citizen's Advice Bureaux National Taxi Association Parliamentary Advisory Council on Transport Safety Pizza and Pasta Association Public and Commercial Services Union RAC Motoring Services RAC Foundation Road Haulage Association Roadsafe RoSPA Royal Scottish Automobile Club (Motor sport Ltd) St John Ambulance Sainsbury PLC Skills for Logistics Sustrans Tesco Distribution Ltd Trades Union Congress Transport for London Transport 2000 Transport & General Workers Union Transport Research Laboratory University for Industry</p> <p>This list is indicative only, and includes principal stakeholders. In all, some 6,369 persons and organisations have been notified in writing about this consultation exercise. These include:</p> <p>880 individuals and organisations on the Consultation List including:</p> <ul style="list-style-type: none"> • 150 Local Authority Road Safety Officers • 85 Government Departments and Agencies <p>1,087 Trainers on the DSA Voluntary Register of LGV Trainers 1,677 Trainers on the DSA Voluntary Register of Fleet Driver Trainers 670 Approved Training Bodies 1,785 Trainer Bookers (LGV, PCV and motorcycle) 126 Delegated Examiner Organisations 112 Local Authorities to whom DSA is contracted to provide taxi and private hire tests 32 Theory Test Translators</p>
---	---

BETTER REGULATION EXECUTIVE: CODE OF PRACTICE ON CONSULTATION

THE SEVEN CONSULTATION CRITERIA

Criterion - When to consult

Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion - Duration of consultation exercises

Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion - Clarity of scope and impact

Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion - Accessibility of consultation exercises

Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion - The burden of consultation

Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion - Responsiveness of consultation exercises

Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion - Capacity to consult

Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

Further information about the Code of Practice is available at the Department for Business Enterprise and Regulatory Reform website: <http://bre.berr.gov.uk/regulation/consultation/code/index.asp>