

<b>Title:</b> Post Implementation Review of The Motor Cars (Driving Instruction) Regulations 2005 <b>PIR No:</b> DfTPIR0054 <b>Lead department or agency:</b> <b>Driver and Vehicle Standards Agency</b> <b>Other departments or agencies:</b> <b>Department for Transport</b> <b>Contact for enquiries:</b> policy@dvs.gov.uk	<b>Post Implementation Review</b>
	<b>Source of intervention:</b> Domestic
	<b>Type of regulation:</b> Secondary legislation
	<b>Type of review:</b> Statutory - other
	<b>Date of implementation:</b> 10/08/2005
	<b>Date review due (if applicable):</b> 09/12/2021
<b>Summary: Intervention and Review</b>	<b>RPC Opinion: Not Applicable</b>

**1a. What were the policy objectives and the intended effects? (If policy objectives have changed, please explain how).**

The Motor Cars (Driving Instruction) Regulations 2005 (SI 2005/1902) put into effect the requirement for a register of Approved Driving Instructors (ADIs) which is set out in Road Traffic Act 1988. The 1988 Act requires all those giving paid driving instruction in Great Britain to be registered (or to hold a trainee licence) and includes provisions such as the requirement to be fit and proper and to pass a number of examinations. Neither the 2005 regulations nor the 1988 Act introduced these underpinning measures. They go back to Road Traffic Act 1962 and were updated at various times. The early legislation is referenced below and under “History of the ADI register”<sup>1</sup> in the evidence base. The 2005 regulations are a consolidation of regulations made in 1989<sup>2</sup>.

This Post Implementation Review (PIR) considers The Motor Cars (Driving Instruction) Regulations 2005, and The Driving Instruction (Compensation Scheme) Regulations 2012 (SI 2012/1548). It is being undertaken as a result of provision in regulation 23 of The Motor Cars (Driving Instruction) Regulations that they are reviewed periodically. The review requirement itself stems from provision in The Driving and Motorcycle Riding Instructors (Recognition of European Professional Qualifications) Regulations (SI 2016/1089). This states that The Secretary of State must, “from time to time”, from 9 December 2021 and then at intervals not exceeding five years, carry out a review of the regulations. The report must, in particular, set out the objectives to be achieved by the regulatory system, assess the extent to which those objectives have been achieved and whether they remain appropriate and if they can be achieved with a system which imposes less regulation.

**1b. How far were these objectives and intended effects expected to have been delivered by the review date? If not fully, please explain expected timescales.**

The introduction of the ADI Register took place between 1962 and 1970. Historically, the Register appears to have been introduced effectively. The purpose of this PIR is to consider the latest iteration of the regulatory provision underpinning this scheme, which is the Motor Cars (Driving Instruction) Regulations 2005. This has been subject to some change, such as that arising from The Driving Instruction (Suspension and Exemption Powers) Act in 2009<sup>3</sup> and subsequent compensation scheme in 2012<sup>4</sup> (these are considered under “The Driving Instruction (Suspension and Exemption powers) Act 2009 and the Driving Instruction (Compensation Scheme) Regulations 2012” later in this PIR).

<sup>1</sup> Section 23 of Road Traffic Act 1962 established the ADI register, on a voluntary basis.

Section 3 of Road Traffic (Driving Instruction) Act 1967 included more detail

Section 1 of 1967 Act not commenced at this time - inclusion voluntary

Road Traffic (Driving Instruction) Act 1967 (Commencement No 2) Order 1970 (SI 1970/965) commenced Schedule 1 of the 1967 Act - entry on Register mandatory.

<sup>2</sup> The Motor Cars (Driving Instruction) Regulations 1989 (SI 1989/257)

<sup>3</sup> The Driving Instruction (Suspension and Exemption Powers) Act 2009

<sup>4</sup> The Driving Instruction (Compensation Scheme) Regulations 2012

However, as a mechanism for introducing a Register, the principles are the same. As such, the objectives and intended effects came into force some decades ago. The ADI Registrar's team have been operating the Register successfully since then, with the required examinations conducted effectively, ADIs undertaking standards checks, normally at four yearly intervals, and steps taken to remove those providing inadequate tuition from the Register as required. The ADI Register therefore continues to be fit for purpose.

In addition, the European Union (Recognition of Professional Qualifications) Regulations 2015<sup>5</sup> established that those from elsewhere in the EEA, who held equivalent or higher qualifications to what was required in the UK, should be allowed entry to the Register. Whilst the mechanism to recognise other qualifications was not widely used, prior to the UK's departure from the EU, there is no evidence to suggest it was not introduced effectively.

## **2. Describe the rationale for the evidence sought and the level of resources used to collect it, i.e. the assessment of proportionality.**

The 2005 regulations consolidated previous regulations from 1989<sup>6</sup>. They also revised some fees and introduced procedural measures into the ADI qualification and standards check process. The impact of the changes was not, however, such to have a significant burden on individuals. They, in the main, replicated the regulatory provisions that had been introduced some decades earlier. As they did not introduce new costs, other than revised fees, we consider that a low evidence review is appropriate.

## **3. Describe the principal data collection approaches that have been used to gather evidence for this PIR.**

We have taken into account our experience of managing the ADI Register since its inception, the statistics from the Driver and Vehicle Standards Agency (DVSA)'s business plan and the broad level of compliance with the scheme. We have considered research that has been undertaken over recent years that has included the views of ADIs and learner drivers. We have also sought the views of ADI associations, who represent the views of their members. There is regular engagement with stakeholders, via the ADI Registrar's team and senior management within DVSA. We have obtained views for this PIR via a survey of the associations.

## **4. To what extent has the regulation achieved its policy objectives? Have there been any unintended effects?**

The 2005 regulations in the main consolidated previous regulatory provisions that had already been established. The aim of previous regulations was to put into effect the key provisions of Part V of Road Traffic Act 1988 with regard to establishing a Register for paid driving instruction, thereby providing assurance to the public that membership of the Register meant that instructional standards, and for an ADI to be a "fit and proper" person, were in place and were being monitored. In practice, these included examinations to gain entry to the Register, and associated fees, a trainee licence for those gaining practical experience of giving instruction, a regular check of standards and a mechanism for removal and appeal.

The 2005 regulations replicated the policy objectives that had been established previously. They also increased fees for qualifying tests and the trainee licence and introduced some procedural changes – they introduced "show me tell me" questions relating to vehicle safety checks into the driving ability and fitness element of the qualifying tests, the option to assess an instructor's ability to coach trainees who were not

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<sup>5</sup> SI 2015/2059

<sup>6</sup> The Motor Cars (Driving Instruction) Regulations 1989 (1989/2057)

learner drivers, photo- ID to be presented at tests and the requirement for vehicles used for practical tests to have a seat belt, a head restraint and additional rear view mirror for use by the examiner. There were also later additions, such as a means of suspending an instructor and the mutual recognition of qualifications, but these were not introduced by the regulations made in 2005.

**5a. Please provide a brief recap of the original assumptions about the costs and benefits of the regulation and its effects on business (e.g. as set out in the IA)**

The Regulatory Impact Assessment (RIA) set out changes in fees for ADI qualifying tests and the trainee licence. These are included in the evidence base of this PIR. The RIA estimated that the increases would represent less than 1% of the total cost of a person attempting to qualify as an instructor. It also estimated that the compliance cost for business of obtaining the appropriate skills to pass the “show me/tell me” part of the qualifying test to be modest, that there would be no extra cost from introducing the role play assessment, that most instructors, holding a full driving licence, would be unlikely to face additional costs by presenting photo-ID and that the features on a vehicle would already be a requirement for those presented for tests, with most instructors already owning additional rear view mirrors for use in lessons.

**5b. What have been the actual costs and benefits of the regulation and its effects on business?**

We consider that the estimates made in the original RIA are broadly accurate. Most elements have operated effectively, except for the role play, which was subsequently abolished in the standards check in 2014 and from the practical test of ability to instruct in 2017. Fees have subsequently increased in various amending regulations and these are set out in the evidence base. Taken together, these are estimated to have added an average of some £1.7m to costs for each year since 2005.

In the wider sense, feedback from the driving instruction industry and learner drivers indicates that the register is seen as regulating and setting a standard in the instruction offered to the public, as well as in standards of conduct. They thereby provide a benefit as set against an unregulated market. These standards depend on the robust management of the register. As to costs, these are primarily fees paid by prospective instructors for a trainee licence and examinations taken in qualification, along with a four-yearly registration fee (see Annex D). The payment of fees for these services were all in place before the 2005 regulations.

**6. Assessment of risks or uncertainties in evidence base / Other issues to note**

The requirements in regulation, including fee levels, as well as numbers taking tests are objective. However, the feedback received from consultation with industry representatives, along with research undertaken with candidates, is by its very nature subjective in essence, relying on input and private information from individuals. Whilst there may be uncertainties associated with a subjective assessment, this cannot be avoided in a review such as this, where we are looking at perceptions of the users of a service. In addition, any benefits from the 2005 increases are not monetised so we cannot know whether the benefits generated from the increase in fees pass the benefit-cost test. However, by taking this together, it is, however, possible to reach a reasonably objective assessment of the overall operation of the register and driving instruction in Great Britain.

**7. Lessons for future Impact Assessments**

This PIR reviews provisions that were introduced some time ago, in the 1960's and 1970's, and consolidated in the 2005 regulations, which are the ones being analysed. We have engaged with the driving instruction industry, and considered extensive research findings which are detailed in Annex C.

This engagement and research may be of assistance in providing background to the running of the Register when officials are conducting future assessments.

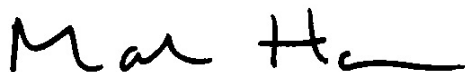
**8. What next steps are proposed for the regulation (e.g. remain/renewal, amendment, removal or replacement)?**

This PIR recommends that the regulations are retained as they have put in place a system for registering and quality assuring driving instruction for many decades. There are, however, potential opportunities, which are referred to in the text below. This can involve the scope of the regulations, a risk based approach to quality assurance and improved consumer information. This needs to take into account that the powers of the Registrar are limited, with only a written warning, suspension or removal being available sanctions.

Sign-off for Post Implementation Review:

***I have read the PIR and I am satisfied that it represents a fair and proportionate assessment of the impact of the policy.***

Signed:



Date: 17/04/2023

## Evidence Base

Please provide additional evidence in subsequent sheets, as required.

### 1. POLICY BACKGROUND – THE MOTOR CARS (DRIVING INSTRUCTION) REGULATIONS 2005

#### Legislation

The driver instruction profession in Great Britain has been regulated since the early 1960's. Road Traffic Act 1962 introduced the Approved Driving Instructor (ADI) register on a voluntary basis. It was later made compulsory. The Motor Cars (Driving Instruction) Regulations 2005 were a consolidation of The Motor Cars (Driving Instruction) Regulations 1989 and the various amending regulations that were made.

These regulations have since been augmented to include The Driving Instruction (Compensation Scheme) Regulations 2012, which were introduced as a requirement of the Driving Instruction (Suspension and Exemption Powers) Act 2009, this PIR also reviews the provisions of those regulations.

#### Intention of the ADI regulations

The intention of the ADI regulations<sup>7</sup> is to implement the provisions associated with driving instruction in Part V of Road Traffic Act 1988. The key aim is to ensure that the knowledge, driving and instructional ability of those who take payment for giving driving tuition are of a satisfactory standard to enable them to competently instruct learner drivers. The applicant must, pass three examinations to qualify and undergo a standards check every few years or when the Registrar requires them to do so. In addition, Road Traffic Act 1988 contains the requirement for an ADI to be a fit and proper person.

#### History of the ADI register

Section 23 of Road Traffic Act 1962 established the ADI register, on a voluntary basis.

This was followed by Section 3 of Road Traffic (Driving Instruction) Act 1967, which set out in more detail the requirements to be included in the Register. This included a “test prescribed by regulations of continued ability and fitness to give instruction in the driving of motor cars” – the “standards check”. But Section 1 of the Act, which made entry on the Register mandatory, was not commenced at this stage. This meant that inclusion on the Register was still voluntary.

Road Traffic (Driving Instruction) Act 1967 (Commencement No 2) Order 1970 (SI 1970/965) commenced Schedule 1 of the 1967 Act - “Driving instruction for payment to be given only by registered or licenced persons” – thereby making entry on the Register mandatory.

#### Part V of Road Traffic Act 1988

Part V of Road Traffic Act 1988 runs from section 123 to 142. The key elements covered are at **Annex A**.

Most requirements are prescribed in the Act. However, some require regulations to implement them. The key ones are the different examinations required to qualify and maintain registration: written examination, practical test of ability and fitness to drive, and practical test of ability and fitness to instruct.

This legislation has been amended by subsequent Acts of Parliament.

#### Transport Act 2000

A number of provisions relating to the ADI scheme were made in Transport Act 2000. It added the provision, in section 131, for appeals to be heard by the Transport Tribunal (later amended to be heard by the first-tier tribunal<sup>8</sup>).

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<sup>7</sup> The Motor Cars (Driving Instruction) Regulations 2005 (SI 2005/1902)

<sup>8</sup> (Transfer of Functions (Transport Tribunal and Appeal Panel) Order 2009/1885 [Sch.1 para.11\(a\)](#) )

It also amended sections 127, 128, 130 and 131, for time periods after which the decision of the Registrar would apply and methods of appeal.

It also introduced, at 99ZA, the ability to introduce regulations which make provision about driver training, in the driving of motor vehicles by means of courses provided in accordance with the regulations. 99ZB provides for restrictions on the ability, unless a course has been, or is being, taken, to take a driving test, drive certain vehicles, including in prescribed circumstances, or obtain a licence. 99ZC provides for approvals of courses, training, assessment and supervision, charges payable and for different provisions for different vehicles, persons or circumstances.

It would be necessary to make regulations to implement these provisions. Whilst they are outside the scope of this PIR, they do indicate an intention to continually review the legislation and make changes to improve them where this is possible. However, it is possible that decisions taken in future may lead to re-consideration of those provisions.

### Road Safety Act 2006

Provisions in Road Safety Act 2006<sup>9</sup> (RSA 2006) were also made but have not been commenced. When commenced, they would replace the current scheme with a new one and introduce various new provisions, for example to allow businesses to be registered along with instructors, who would be required to ensure that premises and vehicles reached a minimum standard during the registration and could be inspected. Registration would apply to different classes of vehicle, not just cars. In addition, the Registrar would be able to consider other methods of assessment for continued registration,

Some elements of RSA 2006 may no longer be considered a preferred course of action. For example, they would remove the current trainee licence scheme, which is used extensively for preparation for Part 3 (the method for conducting this assessment has since been changed, as recently as in 2017). If they were introduced, it would need to be considered whether this was appropriate and the impact this might have on prospective ADIs and their preparation for the qualifying examinations.

### The Driving Instruction (Suspension and Exemption Powers) Act 2009

The Driving Instruction (Suspension and Exemption Powers) Act 2009 introduced provision for an instructor to be suspended in circumstances where the Registrar “believes that the person would pose a significant threat to the safety of members of the public if the person’s registration were not suspended.” This provision would only apply if regulations introducing a compensation scheme were introduced (they were introduced in 2012 – see below).

### The Deregulation Act 2015

Prior to the introduction of this Act, there was a separate system for the registration of disabled ADIs. This was removed by the Deregulation Act 2015. However, the Act also allows the Registrar to require an applicant to submit for an emergency control assessment. This applies if the Registrar has reasonable grounds for believing that the person would be unable to take control of the vehicle if an emergency arose while they were giving instruction.

### The Driving Instructors Registration Act 2016

The Driving Instructors (Registration Act) 2016 introduced provision for an ADI to voluntarily be removed from the register during the four years of registration. It also streamlined the method of re-joining the Register within four years by taking a further standards check (in legislation this is described as “the test of the continued ability to give instruction”), rather than the full qualification. This has yet to be implemented.

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<sup>9</sup> Road Safety Act 2006 Schedule 6 paragraphs 2-5, 8-23, 25-33

## **Regulations made by powers in the Act**

### Motor Cars (Driving Instruction) Regulations 2005

These are the principal regulations affecting the operation of the ADI scheme and are the main focus of this review. They put into effect the main provisions of Road Traffic Act 1988. The key elements covered are at **Annex B**.

### The Driving Instruction (Compensation Scheme) Regulations 2012

These regulations were introduced as a result of The Driving Instruction (Suspension and Exemption Powers) Act 2009. The Act is intended to allow the Registrar to suspend an ADI immediately, where they “believe that the person would pose a significant threat to the safety of members of the public if the person's registration were not suspended.” It provided that a compensation scheme is contained in regulations, to ensure that suspensions are fair and only imposed in situations where there is sufficient reason for doing so. The applicant could apply for income and non-income losses.

### The Driving and Motorcycle Riding Instructors (Recognition of European Professional Qualifications) Regulations 2016

These provide for the recognition in Great Britain of the professional qualifications of driving instructors obtained in the European Economic Area or in Switzerland. They also set a date for review.

An unintended consequence of these regulations is that ADIs can supervise learner drivers of other categories of vehicle without holding the relevant driving entitlement for a minimum period of three years, as is required for other persons supervising learner drivers. This is something that may need to be rectified when there is a legislative opportunity.

## **Measures introduced by the 2005 regulations**

The 2005 regulations, whilst they were essentially consolidating and did not make huge amendments, did introduce a small number of changes. In addition to fee changes for qualifying tests and trainee licence, the following were introduced:

### European driving test standards were incorporated into the driving ability and fitness test for driving instructors (the “show me tell me” questions)

These questions formed part of the driving test that ADIs train learners to take. It was reasonable that prospective instructors should cover them in the qualifying test. This change did not add an administrative burden (no additional test appointment was needed) and the impact is considered to have been low

### The option to assess an instructor's ability to coach trainees who are not learner drivers as an option within the practical test of instructional ability

This measure was introduced but did not work in practice. It proved to be unrealistic, with examiners needing to drive, safely simulate faults and carry out an assessment at the same time. It was removed from the test of continued ability to instruct in 2014 and the practical test of ability to instruct in 2017.

### The requirement for candidates for tests taken by ADIs and prospective ADIs to present photo-ID

Most new applicants to qualify as an ADI are likely to have a photocard driving licence. Our assessment is that the impact of this measure was minimal.

### Requirements that vehicles used for practical tests of ADIs have a seat belt, and (where applicable) a head restraint and additional internal rear view mirror for use by the examiner

Driving instructors generally use modern vehicles and most new cars since 2005 will have these elements, except for the additional rear view mirror. However, ADIs and trainees will be teaching learner drivers and will need an additional mirror in most cases, so that they can conduct lessons effectively. In addition, over

80% of ADIs on the register have presented learner drivers for test, and so will need an extra mirror. Of the remainder, anecdotally, many train trainee instructors, conduct work related road safety assessments or train on their employer's behalf, so will also need to have an additional mirror. The impact of this measure was minimal.

The fee changes were as follows:

	Previous fee	Fee from 2005
ADI Part 3 (test of ability to instruct)	£70	£79 (and then £82 from 1 April 2006)
Trainee driving licence	£100	£125

### **Subsequent amending regulations**

The following regulations were made in the years following the original 2005 regulations, which introduced these following measures.

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2006/525**

- A cheque guarantee or credit card were removed from the ID documents allowed at an ADI test
- That the Secretary of State (via DVSA) could authorise a person to supervise ADI practical tests

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2007/697**

Increased fees for

- ADI Part 1 test from £50 to £75
- ADI part 2 from £79 and £82 to £85
- ADI part 3 from £79 and £82 to £85

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2008/419**

Increased fees for

- ADI Part 1 from £75 to £80
- ADI part 2 from £85 to £99
- ADI part 3 from £85 to £99
- Registration fee from £200 to £300

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2009/844**

Increased fees for

- ADI Part 1 from £80 to £90
- ADI part 2 from £99 to £111
- ADI part 3 from £99 to £111
- Trainee licence from £125 to £140

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2014/2216**

Removed the role play element, which had been introduced in the 2005 regulations, from the test of continued ability and fitness to give instruction.

#### **The Driving Theory Test Fees (Various Amendments) Regulations 2014**

Reduced fees for

- ADI Part 1 from £90 to £83 from October 2014
- Reduced ADI Part 1 from £83 to £81 from October 2015

#### **Motor Cars (Driving Instruction) (Amendment) Regulations 2015/952**

Provided that the Registrar could require any ADI to take emergency control assessment where it had been demonstrated that this was required. Previously only applied to disabled ADIs in a manually controlled car. This now applied to any ADI in the type of car (manual or automatic) for which he or she was licensed to drive.



## Motor Cars (Driving Instruction) (Amendment) Regulations 2017/1156

Removed the role play element from the practical test of ability to instruct.

The following is an assessment of the impact of the fee changes since 2005 based on tests conducted in 2019/20<sup>10</sup> the most recent, pre-Covid, period.

ADI registration/renewal fee		Years fee in place	Difference from previous fee	Difference per annum	Difference per annum x years in place
Numbers	10367				
Fee before 2005	£200	N/A			
Fee from 2005	£200	3	£0	£0	£0
Fee from 2008	£300	13	£100	£1,036,700	£13,477,100
Total cost since 2005					£13,477,100
Cost per year					£842,319
		Years fee in place	Difference from 2005	Difference per annum	Difference per annum x years in place
<b>ADI part 1</b>					
Numbers	10162				
Fee before 2005	£50	N/A			
Fee from 2005	£50	2	£0	£0	£0
Fee from 2007	£75	1	£25	£254,050	£254,050
Fee from 2008	£80	1	£30	£304,860	£304,860
Fee from 2009	£90	5	£40	£406,480	£2,032,400
Fee from 2014	£83	1	£33	£335,346	£335,346
Fee from 2015	£81	6	£31	£315,022	£1,890,132
Total cost since 2005					£4,816,788
Cost per year					£301,049
		Years fee in place	Difference from 2005	Difference per annum	Difference per annum x years in place
<b>ADI part 2</b>					
Numbers	5983				
Fee before 2005	£70	N/A			
Fee from 2005	£79	1	£9	£53,847	£53,847
Fee from 2006	£82	1	£12	£71,796	£71,796
Fee from 2007	£85	1	£15	£89,745	£89,745
Fee from 2008	£99	1	£29	£173,507	£173,507
Fee from 2009	£111	12	£41	£245,303	£2,943,636
Total cost since 2005					£3,332,531
Cost per year					£208,283
		Years fee in place	Difference from 2005	Difference per annum	Difference per annum x years in place
<b>ADI part 3</b>					
Numbers	6559				

<sup>10</sup> DVSA figures

Fee before 2005	£70	N/A			
Fee from 2005	£79	1	£9	£59,031	£59,031
Fee from 2006	£82	1	£12	£78,708	£78,708
Fee from 2007	£85	1	£15	£98,385	£98,385
Fee from 2008	£99	1	£29	£190,211	£190,211
Fee from 2009	£111	12	£41	£268,919	£3,227,028
Total cost since 2005					£3,653,363
Cost per year					£228,335
		<b>Years fee in place</b>	<b>Difference from 2005</b>	<b>Difference per annum</b>	<b>Difference per annum x years in place</b>
<b>Trainee driving licence</b>					
Numbers	3386				
Fee before 2005	£100	N/A			
Fee from 2005	£125	4	£25	£84,650	£338,600
Fee from 2009	£140	12	£40	£135,440	£1,625,280
Total cost since 2005					£1,963,880
Cost per year					£122,742.50
<b>Totals</b>					
Totals of set of total costs since 2005					£27,243,662
Cost per year					£1,702,729

## 2. POST-IMPLEMENTATION REVIEW BACKGROUND

The review is being undertaken as a result of provision in The Driving and Motorcycle Riding Instructors (Recognition of European Professional Qualifications) Regulations 2016. This states that this report must in particular:

- set out the objective intended to be achieved by the regulatory system established by these Regulations,
- assess the extent to which those objectives are achieved, and
- assess whether those objectives remain appropriate and, if so, the extent to which they could be achieved with a system that imposes less regulation.

The Driving Instruction (Compensation Scheme) Regulations 2012, in the impact assessment accompanying them, also contain a review clause to be actioned in 2020 or after three claims, whichever occurs first. There have not, at present, been three claims and so the regulations are being reviewed in 2020/21 as part of the wider review of the ADI regulations.

## 3. OBJECTIVES INTENDED TO BE ACHIEVED BY THE REGULATORY SYSTEM ESTABLISHED BY THESE REGULATIONS

### Objectives of the Register

The requirements of the ADI regulations are set out at **Annex B**. The main objectives of the ADI regulations in their entirety can be summarised as follows:

- to establish a register of ADIs - those legally able to provide driving instruction for money or money's worth in Great Britain – in accordance with Part V of Road Traffic Act 1988.
- to establish a system for prospective ADIs to gain entry to the Register
- to ensure that the system for entry complies with Part V of Road Traffic Act 1988. This requires a written examination, practical test of ability to drive, a practical test of ability to instruct and a standards check to be taken periodically.

- to prescribe a fee for entry to the Register and to set the amount of that fee.
- to provide for an emergency control assessment, where necessary, and the period of that assessment.
- to provide for a timescale in which an ADI must take a test of continued ability to instruct,
- to provide for a certificate or licence to be exhibited on the car when giving paid instruction.
- to require the applicant to provide a vehicle for the practical tests.
- to set out the conditions for the issue of trainee licences.
- to provide a mechanism to appeal the Registrar's decision not to include a person on the Register or to remove their name from the Register.
- to put in place a system of compensation in cases where the suspension is terminated and a person is not removed from the Register, or an appeal is successful
- to prescribe the form of certificate and licence.

## **Assessment of how effectively the Register meets these objectives**

### What is included in the regulations

As required by Part V of Road Traffic Act 1988 (and its predecessors) the regulations establish a procedure for a Register to be put in place. The method for gaining entry is clearly set out in regulations and this complies with the Act, comprising (at Part 2) a written examination (regulation 5), practical test of ability to drive (regulation 6) and practical test of ability to instruct (regulation 7), along (at Part 4) with a test of continued ability and fitness to give instruction. In practice, these are conducted as follows:

#### Written examination (otherwise referred to as the "ADI Part 1" test)

This is a classroom-based test on issues that will be relevant to a driving instructor. It covers issues such as the principles of road safety, techniques of driving a car, and items surrounding tuition and driving instruction. It was originally a pen and paper test but is now an on-screen test and is conducted as a theory test on a computer screen. The on-screen hazard perception test is taken at the same time.

#### Practical test of ability to drive (otherwise referred to as the "ADI Part 2" test)

This is a more demanding test of driving ability than the one taken to obtain a driving licence. It also includes the hazard perception test element, which is taken at the same time as the written examination. The on-road element consists of expert handling of the controls, use of correct road procedure, anticipation of the actions of other road users and taking of appropriate action, sound judgement of distance, speed and timing and consideration for convenience, and safety of other road users.

#### Practical test of ability to instruct (otherwise referred to as the "ADI Part 3" test)

This is a test where the candidate demonstrates their knowledge and ability by giving practical driving instruction on a road. The examiner has regard to method, clarity, adequacy and correctness of instruction, observation and proper correction of the pupil's errors, manner, patience and tact in dealing with the pupil, and ability to inspire confidence.

Test of continued ability and fitness to give instruction (otherwise referred to as the "standards check") This is an assessment of instruction delivered by an ADI. It is conducted by an examiner observing a driving lesson given by an ADI to a pupil. The examiner assesses instructional ability in particular their method, clarity, adequacy and correctness of instruction, observation and proper correction of the pupil's errors, manner, patience and tact in dealing with the pupil, and ability to inspire confidence.

The regulations also describe the test being one of testing hazard perception. This was added to the regulations in the 2000s, when hazard perception testing was introduced in the theory test. It allowed for all existing ADIs, who had not previously passed the hazard perception test, to do so, so they were familiar with the tests taken by their pupils. All new ADIs take the hazard perception test as part of qualification and, if they have not, there is provision for the Registrar to require the standards check to comprise such a test.

The regulations also set out the necessary fees for entry, although these, and the activities which they cover can be changed by amendments to regulations, if the Minister considers that this is desirable.

The regulations also include provision for taking an emergency control assessment and a test of continued ability to instruct, and for mutual recognition of qualifications. If the elements in the written examination and hazard perception test have not been covered previously, these may also be taken. They specify (at regulation 20) the requirement for exhibiting the certificate or licence when giving instruction, (at regulation 8) the requirement for providing, at the candidate's own expense, a motor vehicle for the practical parts of the test, (at Part 5) the arrangements for a trainee licence.

The requirement to be "fit and proper" is contained in section 125 (3) (e) of Road Traffic Act 1988 rather than The Motor Cars (Driving Instruction) Regulations 2005. As part of the procedure for admission to the Register, the Registrar requires that the applicant undertakes an enhanced Disclosure and Barring Service (DBS) check. This DBS check is intended to address the issue of safeguarding with regard to young people and vulnerable adults. As the "fit and proper" criterion is in primary legislation, it is outside the scope of this PIR. However, it is worth providing observations on its effectiveness in evaluation below.

### Historical background

With regard to practical application, the Register has been operating since the late 1960s. It did not become compulsory until 1970. But the format and requirements of the Register have remained consistent throughout its life. Regulations were consolidated in 2005 but remained essentially in the same format as the previous version from 1989. This is therefore not a review of new regulation. It is regulatory provision that has been in place, in one form or another, for around half a century.

### Evaluation

#### *Operation of the regulations*

There has been ample time for the effectiveness of the regulations to be established. During its lifetime, the operation of the Register has been conducted along lines that have, within the profession, been generally seen as fair. The passing of three tests, and a standards check, are considered to be proportionate ways of establishing competence to be an instructor. These are, in any case, set out in primary legislation, so any amendments to them would by necessity be limited, if that action was considered desirable.

#### *Fit and proper*

The "fit and proper" description, of an instructor to be included on the Register, is in RTA 1988. It is, therefore, a provision which applies to the operation of the Register, without being included in the 2005 regulations. It is, however, a key element and is worthy of a comment here.

"Fit and proper" is a general expression which the Registrar, as a senior official within DVSA operating in a statutory capacity<sup>11</sup>, can consider when deciding about whether to allow someone's name to be entered or retained in the Register. Its loose phraseology gives flexibility to the Registrar's discretion and allows decisions to be made, taking into account the standards expected of the time. This can cover areas such as a motoring offence, a conviction for a serious offence or other standards, with the overall aim of protecting the those paying to learn to drive.

Since the inception of the Register, "fit and proper" has been applied proportionately, considering the merits of a case, the standards expected of an ADI and societal expectations. The decision-making power has worked alongside other factors; for example, the conditions for retention in the legislation, the appeal arrangements for refusal to enter a person's name on the Register or unfair removal, and the expectations and influence of ADI representative bodies. This arrangement is considered to have worked appropriately and is an effective framework within which the Register can operate.

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<sup>11</sup> In section 125 of Road Traffic Act 1988, "the Registrar" is referred to as "the officer of the Secretary of State.... by whom the register is, on behalf of the Secretary of State, compiled and maintained"

## *Adaptability of the ADI scheme*

Over its life, the Register has absorbed changes. In doing so, it has shown its capability to be flexible. It has added the hazard perception test into Part 2 of the assessment process and absorbed the evolution of the test of continued ability to instruct evolved from a fault based “check test” to a wider “standards check” assessment, providing more comprehensive feedback on the ADI’s strengths and areas for development. Although role play by the examiner was included as an option in the 2005 regulations, it proved unworkable in practice and was removed from the test of continued ability to instruct in 2014 and the practical test of ability to instruct in 2017. By incorporating the provisions of the suspension power, when this was introduced by primary legislation, the Register has included societal changes, in terms of what is perceived as acceptable. This also means that the Registrar can take action when necessary. The onus is now placed more firmly on the Registrar, as the official in charge of the Register in a statutory capacity, to have safeguarding responsibilities towards those using the services of the regulated bodies. This has meant that the operation of the Register has modernised to reflect the expectations of a changing society and to ensure the safety of learner drivers while undertaking training.

Overall, therefore, the ADI Regulations have shown longevity and proven their effectiveness in establishing and maintaining a Register.

## *Road casualties, statistics and the ADI Register*

The existence of the ADI Register is not open to change in this review. It is looking at the operation of the regulations implementing the Register, rather than the Register itself, which is established by Primary legislation, RTA 1988. However, it might be worth noting the wider statistical position.

With regard to road casualties, these have reduced markedly from the 1970’s to 2020. From 6,352 killed and 80,544 seriously injured in 1979, the figures reduced to 1,784 and 25,511 in 2018. But there are a variety of reasons that can contribute to this. These include changes to vehicle design, speed limits, changes to the test itself etc.

Learner driver pass rates have remained fairly steady for some decades. When the driving test was introduced in 1935, they were in the 60% area, reducing to the 50% area in the 1950s and then to the region on 47%, where, apart from a small spike in the early 1990s, they have remained since.

## **The Driving Instruction (Suspension and Exemption powers) Act 2009 and the Driving Instruction (Compensation Scheme) Regulations 2012**

These regulations, as indicated above, were introduced as a result of The Driving Instruction (Suspension and Exemption powers) Act 2009.

The Act allows the Registrar to suspend an ADI immediately, in cases where the Registrar:

- has given, or is about to give, the person notice under subsection (4) (of section 128 of Road Traffic Act 1988).
- is considering whether to remove the person's name from the register, or has decided to remove the name but the decision is not yet in effect, and believes that the person would pose a significant threat to the safety of members of the public if the person's registration were not suspended.

The Act provided that, before the suspension power could be used, there should be a compensation scheme included in regulations. This is to ensure that suspensions are fair and only imposed in situations where there is a proper reason for the suspension to have been introduced.

The structure of the 2009 Act is that, if changes to the ADI scheme were made by powers in Transport Act 2000, the main part of the 2009 Act would apply. Until then, Schedule 1, Transitory Amendments to Existing Regime, apply to the arrangements for suspension.

Since the suspension power was made effective by the introduction of The Driving Instruction (Compensation Scheme) Regulations 2012, there have been thirty-three occasions where an instructor has

been suspended. This level of use of the suspension indicates that the power is being used proportionately, accepting that suspension is only being used where there is reason to suspend, to protect the public. It is therefore concluded that the suspension power is used as envisaged.

### **The Driving and Motorcycle Riding Instructors (Recognition of European Professional Qualifications) Regulations 2016**

The above regulations implemented Directive 2005/36/EC, as last amended by Directive 2013/55/EU on the recognition of professional qualifications in the European Economic Area or Switzerland. One element of this review is to consider how the Directive was implemented in other European member states.

In order to obtain an understanding of this, we wrote to The International Commission for Driver Testing (CIECA) for advice from the different states. We received information from five states on the question:

*“Could you please advise of the way that mutual recognition of professional qualifications was introduced in your state with regard to driving instruction?”*

Belgium	<p>A foreign driving instructor can apply to the Flemish government to also become a driving instructor in Flanders.</p> <p>Instructors need to provide The “Departement Mobiliteit en openbare werken” with following documents:</p> <ul style="list-style-type: none"> <li>• Copy of driving license</li> <li>• Copy of identity card</li> <li>• Copy of your credentials/instruction license/diploma</li> </ul> <p>After they have checked the applicant’s credentials, they also need to provide a declaration about “good behaviour” and the applicant needs to take a medical examination to check that they are sufficiently healthy to work as a driving instructor and to work with young people.</p> <p>Applicants who wish to start a driving school also need to prove they had a driving school in another European country for at least a year.</p>
Portugal	<p>Citizens who have obtained the qualification in another Member State of the European Union and who intend to establish themselves as driving instructors in Portugal can obtain a Portuguese license through the recognition of their qualifications, as long as they meet the minimum requirements required for Portuguese instructors (12 Year of school and 5 years of category B).</p>
Sweden	<p>The transposition of directive 2005/36/EC in Sweden regarding driving instruction was included in the Swedish Road Administration’s regulations. The Administration had authorization to decide regulations regarding driving instruction both in the Swedish law and ordinance concerning driving schools. The rules in the regulation from the Swedish Road Administration were the same as the ones in the directive 2005/36/EC, in other words the Swedish rules were a copy of the ones in the directive. The Swedish regulations (VVFS</p>

	2007:304) were repealed when directive 2013/55/EU was brought into force. Today, regulation concerning recognition of professional qualifications is found in so called horizontal regulations in Sweden, ie all the rules for recognition of professional qualifications are in a Swedish law and ordinances which are applicable for all occupations.
The Netherlands	In the Netherlands, the professional qualification for driving instructors is in the hands of the IBKI organization, which is responsible for examinations and certification in the mobility sector ( <a href="http://www.ibki.nl">www.ibki.nl</a> ). Under certain conditions it is possible to have a foreign recognition for the profession of driving instructor recognized and converted into a Dutch certificate for driving instructor <sup>12</sup>
Germany	The federal states are responsible for the recognition of professional qualifications. Regulations are in German law. Those with a qualification from outside Germany may apply for recognition of that qualification <sup>13</sup>

### The ADI Register in practice

There has been a good level of research undertaken over recent years into ADIs, learner drivers and the interaction with ADIs. This has indicated the way in which ADIs approach teaching, the opinions of learner drivers and how this relates to how students learn to drive.

The details of the research are as follows:

- Customer Satisfaction– Driving Test Candidates (Q4 2019/20)
- Impact evaluation of the 2017 car driving test changes: research findings – 11 December 2017 – 17 February 2018 (TRL)
- Learners on motorways evaluation. Q1 interim results (April 2020)
- Lifetime of Safe Driving – a driving instructor perspective (November 2019)
- Lifetime of safe driving – learners phase 1 (January 2019)
- Lifetime of safe driving – learners phase 2 (August/September 2019)
- Measuring awareness of the proposed changes to the ADI Part 3 test (August 2016)

Some of the key findings from this research, as they relate to ADIs and learning to drive generally, are at **Annex C**.

These findings are not all from the same piece of research. However, they give a broad picture and indicate that, as envisaged in the legislation, ADIs are key to driver training taken by learner drivers in Great Britain, with 98% of candidates paying for instruction from an ADI. The research established that the mean number of hours learning undertaken with an ADI was 38.7 hours. Research also indicated that 47.3% had, in addition, undertaken practice with friends and family.

Personal recommendation, typically from family, friends and online sources, was the main reason for choosing an ADI for 57.7% of those surveyed. Other key factors included the ADI being local to the learner driver (35.8%), the price of lessons (16.5%), that they already knew the ADI (13.6%) and that the ADI was part of a familiar company or organisation (10.8%).

<sup>12</sup> The procedure in the Netherlands is described in: <https://www.ibki.nl/rijinstructie/becoming-a-driving-instructor-with-a-dutch-wrm-certificate>

<sup>13</sup> Information on the procedure in Germany is available here - <https://www.anererkennung-in-deutschland.de/en/interest/finder/profession/509>

There was a strong professional interaction between ADI and pupils, up to the point where the candidate takes and passes the driving test and often beyond. 93% of ADIs would tell pupils openly when they are not ready to take the test. 97% of ADIs set objectives for their pupils, with 30% setting specific objectives. These included elements such as driving with a satnav (94%), independent driving (94%), driving on dual carriageways (93%), driving in residential areas (93%) and driving in congested towns (92%).

79.3% sat in on the debrief following the test. 70% of candidates had taken a mock driving test, meant to replicate the conditions a candidate would face on the test itself. However, only 15.7% of ADIs sat in on the test itself. The ADI was reported as the biggest factor in making learner drivers feel ready for the test by 48%.

This involvement continues after the test has been passed, with 98% of ADIs offer post-test instruction and 61% always suggesting it.

There is also interaction between ADIs and parents/guardians of pupils. In discussions with parents, 85% discussed how parents can support pupils.

The ADI profession is partly organised as a body, with just under half (48%) belonging to one of the representative organisations – the Driving Instructors Association (30%), the ADI National Joint Council (12%), the Motor Schools Association (7%) and other similar organisations (13%). Whilst these bodies are not trade unions as such, they can represent the interests of the wider ADI community in dealings with DVSA, the regulator, and when considering proposed changes to the Register. They also represent individuals to the Registrar to challenge a decision to remove their name from the register and in appeals against those decisions.

### **Engagement with the ADI industry**

In completing this PIR, we have engaged with the driver training industry, in the form of the National Associations Strategic Partnership (NASP), the umbrella body of the ADI representative organisations. We have undertaken a survey, which NASP has passed down to the representative organisations, who have, in turn, consulted their members.

We received five responses, from individual instructors, the ADI National Joint Council (ADINJC) and the Motor Schools Association (MSA). These commented against various questions.

#### Do you consider the operation of the ADI register effectively maintains high standards of instruction?

It was felt that the register goes some way to regulating and setting a minimum standard but one representative body said it can fall short of delivery in some cases. It was questioned whether a standards check, with a widely dispersed network of ADIs, was appropriate (though it was preferable to basing an assessment of ADIs on pass rates, which would encourage teaching of test routes, abandoning some pupils and ignore how individuals react in a test situation). There was support for attendance at CPD courses during the four-year period between standards checks. However, it was observed that the Register had little effect on day-to-day driver training. It was also suggested that a more appropriate way of looking at this could be whether the Register was as “robust and frequent” as it could be.

#### Do you consider the operation of the ADI register effectively maintains high standards of behaviour?

It was considered that high standards are maintained because of the robust way the Register is currently run. However, standards are only invoked where there is failure, thereby capturing the lowest standards rather than maintaining high ones. A robust Code of Practice works well, although not all ADIs are signed up to it.

The concept of "fit and proper" was laudable but this was only challenged when things had gone wrong. There was a lack of opportunity for personal self-evaluation to improve the ADI's level or understanding of "fit and proper" including consequences.



Do you feel that the way the standards check is delivered succeeds in its intention to improve the standard of instruction?

The standards check was a snapshot and did not reflect previous performance, or what had been happening between standards checks. Whilst it was a big improvement on the check test, and the role play system, ADIs could be prone to exam nerves. Monitoring was necessary, as practised by small training schools, and better use of the Crystal reporting system, and twice a year notification to instructors, would be useful. It was also felt that it could be more robust, should reflect the pressure the ADI was under and be more of some help, where the examiner and ADI were working together. Deviating from a lesson plan should not count against the ADI because pupils have specific requirements.

Do you feel that the current qualification arrangements operate successfully?

It was considered that the qualification should be for life, with standards being maintained by reviews for customers and earned recognition through CPD.

It was also felt that the current process was lacking in PDIs understanding what the role fully entails, that Parts 1 and 2 could be more demanding and that it depended heavily on the skill set of the trainer or training provider. As Part 3 only showed one lesson with one pupil, without good training, many areas might merely be missing from the PDIs learning experience, who could just prepare for that day and that lesson. Some thought it should be mandatory to have a trainee licence.

One ADI felt that the test-focussed process, with a time limit, was outdated. A vocational course, aligned to National Standards, overseen by an ADI, would be preferable.

Do you feel that the current arrangements for provision of a trainee licence operate successfully?

It was considered that the trainee licence system was obsolete, should be replaced by an online system and should be 12 months in view of changes to part 3, rather than 6 months, with little opportunity for a second licence. It was felt that a six months licence was not long enough. A longer licence would reduce pressure to have three attempts within six months and reduce worry about a second licence.

It was questioned whether all trainees were of the same standard as qualified instructors. It was suggested that customers should be made aware and there should be a lower cost (10-20%) for a lesson.

Some ADIs felt that that it was not ideal that someone could start teaching for reward without having previously taught live pupils.

It was also suggested that there should be compulsory regulation for ORDIT trainers (those training ADIs), that there should be regional training camps and that different examiners conduct final parts of 2 and 3.

What do you consider to be strengths of the operation of the ADI system?

It was felt that the register offered a uniformity of regulation with formality, structure, legality, rules, a code of conduct and a common point to which to make complaints. Those on the register were able to teach learner drivers to pass the test. The register provided a governing body, which helped to safeguard the public.

What do you consider to be weaknesses of the operation of the ADI system?

It was felt that that the ADI system did not deliver what was intended in terms of national standards, attitudinal and conduct issues, and did not encourage those considering a career in driver training, which was a dispersed profession. The four-yearly registration fee was something that an ADI's livelihood depended on. Entry level should be higher and perhaps require a teaching qualification.

There was a lack of any further training opportunities for ADIs and no way of knowing whether ADIs had understood information provided. It may be time to consider compulsory CPD.

One ADI felt that multiple badges should be issued for instructors with multiple vehicles and that there was a lack of transparency in how the system was managed. There was insufficient consideration of local situations and provisions for local test centres. ADIs should be advised quickly of changes and asked for their views on issues affecting them, rather than those from other industries.

#### Are there any improvements you would suggest to the operation of the ADI system?

It was felt that formal and more academic training would be helpful, in a similar way to an NVQ Level 3. This would improve standards of tuition, behaviour, conduct and internal and external perception of the industry – and maybe move it towards a profession. The benefit of a periodic observation of a driving licence was questioned, as was whether customers were concerned about whether an instructor was Grade A or B.

It was considered that ADI should be a true professional qualification, where an instructor could leave the register and return at any time, if they had evidence of CPD and a standards check. Earned recognition could be used for further monitoring.

There should be feedback at the end of the standards check, which would be meaningful discussion. The Crystal report should be used with each ADI or PDI to help the instructor understand their performance and improve. There could be regional masterclasses or DVSA training days (perhaps as part of CPD) and the use of the level 3 learning and development certificate in qualification process.

ADIs felt that those “on the ground” should be involved more – they knew how things worked. They felt there should be a minimum requirement for ADI trainers.

#### **Summary of proposals from ADI representative bodies**

- Introduction of courses:
- A vocational course, aligned to National Standards, overseen by an ADI. This could replace the test-focussed process.
  - Formal, and more academic, training in a similar way to an NVQ
  - Introduction of CPD with regular courses – perhaps compulsory
  - Regional training camps
  - Process should be more aimed at PDIs understanding the role, Parts 1 and 2 could be more demanding
- ADIs should be allowed to deviate from a lesson plan
- Standards check should be more robust, reflect the pressure an ADI is under and promote greater co-operation between examiner and ADI
- Ongoing monitoring between standards checks by trainers
- Better use of Crystal reporting system
- Standards check should look at more than one lesson with one pupil
- Could make it mandatory to have a trainee licence
- Qualification should be for life
- Before teaching for reward, should have taught actual pupils
- Trainee licence should be 12 months without opportunity to renew
- Customers should be made aware when taught by someone with a trainee licence (perhaps at lower cost)
- Compulsory regulation of and minimum requirement for ORDIT trainers
- Different examiners conduct final parts of 2 and 3
- Multiple badges for instructors with multiple vehicles
- More consideration for local situations and provisions for local test centres
- Involve ADIs in decision making
- Entry level higher and include teaching qualification
- Allow ADIs to leave the Register and return
- Earned recognition
- Feedback at the end of the standards check

## Future

The ADI regulations have proven to be effective in what they set out to achieve. The driving instruction market is regulated to ensure that good quality instruction is available to the paying public. There is an established system for gaining access to the Register. And there are methods for monitoring of the standards of instruction delivered by the periodic standards check and for removal of instructors whose instruction is substandard or who otherwise pose a risk to learners.

But things do not stand still. The ADI associations have suggestions which are included above. There are developing issues which are likely to affect motoring in general and the instruction needed to prepare for driving. They could have implications for the ADI Register. There is also potential need to clarify some of the wording about trainee licences in the 2005 regulations. The following are all issues which we anticipate can be looked at further over the next few years.

There are some areas where it may be possible to introduce some deregulatory changes, although this may need primary legislation. These are as follows.

### Possible deregulation

#### *Clarity of the regulations*

In some cases, it has been suggested that the wording in some of the regulations which relate to trainee licences in The Motor Cars (Driving Instruction) Regulations 2005 could be expressed more clearly or permit elements that it is considered preferable to avoid. This could lead to the simplified regulations, the process of which could be deregulatory. Specific regulations are as follows.

Regulation 13 (g) – this provides that an ADI must take responsibility for supervision of a Prospective Driving Instructor (PDI) during their training. The aim is that trainees are tied to a school and all their pupils are trained through this route. However, it is not explicitly stated and it is suggested that the regulations make this explicit.

Regulation 13 (2) and (3) (c) – This states that there should be 40 hours training for a trainee instructor of which ten hours is conducted in a car. It has been suggested that the regulations are changed for all 40 hours training to be conducted in a car, rather than in a classroom. It would be more realistic if conducted in a car. This also applies to the provision at 15 (6) (d) for supplementary training.

Regulation 15 (3) onwards. It has been suggested that the “relevant dates” following this can be confusing, with the widespread understanding among trainers being that a trainee must book a part three test within three months, which is not the most sensible option; it would be preferable if the part three test is booked with the PDI is ready. All the ‘relevant’ dates are confusing. The aim is for trainees to book when they are ready. The regulations are also silent on the position if the training is not completed within the three month deadline.

Regulation 14 – This states that a trainee licence stays in force until the day immediately following the day on which the holder failed the instructional ability and fitness test (the third part of the qualification process) at the third – and final – attempt, or the expiration of a period of 6 months commencing on the date of the grant, whichever shall first occur. There is a two-year time limit to complete all parts and, in some cases, where this time limit had been reached, there is insufficient time to complete the process following a failure at the first or second attempt. In such cases, it would be sensible for the trainee licence to end following failure, whether it is the first, second or third attempt. This issue could be looked at in the light of the whole question of the length of trainee licences.

Schedule 2 – this describes the syllabus for practical driving instruction training and the information provided to the Registrar. It is suggested that these should align with national standards for driver trainers.

### *Alternative qualifications*

There are qualifications available to the driving instruction professional which could be considered to have equivalence to those taken to be on the Register. An example is the Defence Driving Licence Acquisition Instructor (DLAI) course delivered by the Ministry of Defence. Consideration could be given to amending legislation to allow those who hold this qualification to have access to the Register, subject to the requirements for the periodic standards check and the “fit and proper” consideration, or be exempt from the requirement to be registered, as the police are at present. Other qualifications could be considered. At present, however, anyone who wants to provide instruction in the driving of a motor car needs to pass the same three-part qualification. This would need primary legislation.

### *Introducing qualifications to re-enter the profession*

We are considering ways of enabling an instructor to re-enter the profession by undertaking simplified examinations, avoiding the burden of undertaking the full process of re-taking the three qualifying examinations in full. We would need to look at the essential skills to be tested if we were to introduce such a process. We would also need to consider the length of time after which an instructor had left the register that such an arrangement should apply; an individual's suitability to offer instruction may be different depending on whether the former ADI had left the register some time ago or had done so recently.

### Other future issues

#### *Autonomous vehicles*

With the development of autonomous vehicles, it will need to be established whether it will be necessary for a qualified driver to be in charge. This may have implications for the driving instruction profession. The skills needed to be in charge of an autonomous vehicle may be different from those to drive a standard vehicle. In addition, at present, RTA 1988 provides that instructions given in the course of supplying a motor car are considered as providing instruction for money's worth and therefore within scope of the requirement to be an ADI. Consideration may need to be given to whether ADIs who are not car salespersons have the skills necessary to prepare learners in the use of in-car technical aids in such vehicles.

These issues would need to be resolved with the ADI Register adapting as necessary to changing circumstances.

#### *Theoretical instruction delivered off-road*

Situations have developed where theoretical instruction can be given off-road. This can range from training in a classroom, to guidance on driving a vehicle by a car salesman and analysis of telematics. It is not resolved whether these should fall within the remit of the ADI profession.

#### *Instruction for qualified drivers*

Whilst being registered as an ADI does not confine the instructor to offering paid tuition for learner drivers only (it is necessary to be an ADI to give any paid instruction in a motor car), consideration could be given to introducing provision for specifically registering instruction for qualified drivers. This could cover specific elements which might apply to such drivers, possibly those who have passed a test but not driven for some time, those who are regular drivers but have not received any instruction for some time, or those driving professionally.

#### *Making regulations to bring into force provision for different “classes of instruction”*

Transport Act 2000, at section 257, introduces provision for different types of driver training courses to be introduced, and fees charged. We may wish to introduce provisions for this in regulations and consider the types of courses we would want to introduce. These may include different types of vocational training.

#### *Extending the register to include other categories of training*

At present, Road Traffic Act 1988 requires only those delivering training in a motor car to join the ADI register. There is also a voluntary register for instructors of Fleet drivers. There is also a voluntary arrangement for ORDIT trainers (those who train ADIs). We could consider pursuing new Primary legislation to make membership of such registers mandatory. Consideration can be given to this proposal, considering that it may be outside the scope of this PIR.

### *Modernising Driver Training*

A consultation “Modernising Driver Training” was undertaken in 2013, in line with the wider better regulation agenda. This proposed various reforms, for example introducing civil sanctions with a financial penalty for regulatory non-compliance, discrete payment for a standards check and changes to the standards check grading structure.

### *Splitting the ADI fee*

The current position is that there is one fee payable for ADI registration; currently £300. This single fee takes no account of the need for a standards check to be taken more than once by some ADIs, compared with once for others. This means that the current arrangements do not meet the user pays principle, where those receiving a service pay for that service. This issue could be addressed by splitting the ADI fee and introducing a system where the instructor pays a separate fee for each standards check they need to take. This would require legislative change.

### *Applications*

The First tier Tribunal (Transport) consider that the Registrar cannot refuse applications to commence the qualification process. This can result in the applicant incurring costs in training and the disclosure and barring check. This can be wasted if the applicant is not allowed on the Register after the examinations. Amending the procedure followed, to attempt to resolve this issue, would require primary legislation.

### *Consumer information*

The existence of a national Register means that consumer information can be made available, for the benefit of both learner drivers and ADIs. We operate a system whereby learner drivers can find information about local ADIs in “Find Driving Schools, Lessons and Instructors” on gov.uk. This flows from information held on the Register and ADIs can opt in to participate in the scheme. Consideration will be given to options for further helping consumers better identify the best ADIs using a range of evidence.

### *Quality assurance*

There may be scope to develop quality assurance, in line with wider digital advances for collecting data. Steps are already being taken to improving how quality assurance is undertaken, for example, calling ADIs to discuss test performance before a standards check. We anticipate that this area will be further refined and new ways of looking at assurance issues developed.

**KEY ELEMENTS IN PART V OF ROAD TRAFFIC ACT 1988**

Section 123 - Driving instruction for payment to be given only by registered or licensed persons

- Requirement for person giving instruction to be registered or licensed.
- Requirement for certificate to be exhibited on car when providing paid instruction.
- Definition of what is paid instruction.
- Giving paid instruction if not registered or licenced is an offence.
- It is a defence if the person did not know they were not on the register.

Section 124 – Exemption of police instructors from prohibition imposed by section 123

Section 125 – The register of approved instructors

- Registrar must enter name on register if conditions fulfilled
- Must pass three examinations – written examination, practical test of ability and fitness to drive and practical test of ability and fitness to instruct
- Must be licensed to drive and, during past six years, any period not licenced to drive must not exceed two years.
- Has not been disqualified during four years preceding application
- Is a fit and proper person to have their name included in the register
- Requirement for Registrar to add as a result of mutual recognition of qualifications
- Requirement to submit for test of continued ability and fitness to give instruction

Section 126 – Duration of registration

- Registration lasts four years
- Can apply to be retained on register
- If do not apply within one year , must pass examinations again

Section 127 – Extension of duration of registration

- May apply for extension to registration

Section 128 – Removal of names from register

- Situations where Registrar may remove names
- Power to suspend

Section 129 – Licences for giving instruction so as to obtain practical experience

- Licence may be granted by Registrar
- Applicant must have passed parts one and two (written and practical driving) of examinations

Section 130 – Revocation of licences

- Circumstances under which licence can be revoked

Section 131 – Appeals

- Circumstances under which an applicant can appeal
- Provision for appeals to be made to First Tier Tribunal

Section 131A – Compensation in respect of suspension

- Provision to make regulations for compensation if suspended unfairly

Section 132 – Examinations and tests of ability to give driving instruction

- Provision to make regulations for written examination, practical test of ability and fitness to drive and practical test of ability and fitness to instruct

Section 133 – Review of examinations

- Can apply for review at magistrates' court or, in Scotland, the sheriff within whose jurisdiction he resides

Section 133A – Assessment of a person's ability to control a motor car in an emergency

- Provision for assessment of ability to control car in emergency

Section 133B – Further assessments

Timescale and arrangements for further emergency control assessments

Section 133C – Duty to disclose further disability

- Duty to disclose if suffering from further disability.

Section 133D – Offences relating to giving of paid driving instruction

Section 133E- Direction to disregard emergency control assessment requirement

Section 134 – Power to alter conditions for entry or retention in, and removal from, register and for grant or revocation of licences

- Regulations may amend conditions for inclusion

Section 135 – Power to prescribe form of certificate of registration, etc.

- Regulations may prescribe the form of certificate, etc.

Section 136 – Surrender of certificates and licences

- Certificate or licence to be surrendered if removed from register

Section 137 – Production of certificates and licences to constables and authorised persons

- Must provide certificate to constable

Section 138 – Offences by corporations

- Individual may be prosecuted along with corporation if there has been an offence

Section 139 – Service of notices

- Notice on item in the Act can be served by delivering it to him, or by leaving it at his proper address, or by sending it to him by post.

Section 140 – Receipts

- Makes provision for fees in connection with part V of the 1988 Act which relates to driving instruction to be paid into the Consolidated Fund.

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Section 141 – Regulations

- SoS may make regulations for any purpose for which provision made

Section 141A – Meaning of motor car

- Definition of motor car

Section 142 – Index to Part V

- Index to sections in Act

## **MOTOR CARS (DRIVING INSTRUCTION) REGULATIONS 2005**

### Part 1 - Preliminary

#### 1 Citation and commencement

#### 2 Interpretation

### Part 2 - Examination Of Ability To Give Instruction

#### 3 General provisions

- Description of examinations – written examination, driving ability and fitness test, instructional ability and fitness test

#### 4 Candidate to produce particulars

- Identity documents to be produced

#### 5 Written examination

- Details of the written examination and subjects to be covered

#### 6 Driving ability and fitness test

- Details of driving ability and fitness test including the Hazard Perception Test.

#### 7 Instructional ability and fitness test

- Details of instructional ability and fitness test

#### 8 Motor car to be provided for practical part of examination

- Motor car to be provided for driving ability and fitness test and instructional ability and fitness test
- Detail of vehicle
- Must be insured

#### 8A Further requirements for practical part of the examination

- Allow any person to travel in car authorised by SoS for the purpose of supervising the test or otherwise.

### Part 3 - The Register

#### 9 Additional conditions for entry of name on register

- Application and fee received by Registrar no later than one year after passed examination

#### 10 Additional conditions for removal of names from the register

- The requirement to pass the HPT. This relates to the requirement for all ADIs to take HPT soon after it was introduced

#### 11 Additional condition for retention of names on the register

- Also the requirement to pass the HPT. This relates to the requirement for all ADIs to take HPT soon after it was introduced

### Part 4 - Test Of Continued Ability And Fitness To Give Instruction

#### 12 Nature of test and provision of a motor car

- Description of test and need to provide car

#### 12A Further requirements for practical test

- Allow any person to travel in car authorised by SoS for the purpose of supervising the test or otherwise.

### Part 5 - Licences Under Section 129 Of The Act



13 Additional conditions to be satisfied for the grant of a licence

- Requirement to have fulfilled conditions for issue of trainee licence

14 Duration of licence

- A licence shall remain in force until the expiration of a period of 6 months commencing on the date of the grant or the day immediately following the day on which the holder of the licence failed the instructional ability and fitness test at the third attempt, whichever shall first occur.

15 Conditions subject to which licences are granted

- Timescales for holding licence and tests to be taken, supervision arrangements and records kept

16 Form of licences

- Form set out in Schedule

Part 5a - Ability To Take Control Of A Vehicle In An Emergency

16A Prescribed class of vehicle

- Depends on licence - automatic transmission or manual transmission

16B Emergency control assessments – prescribed time periods

- Requirement to take ECR and timescale for doing so

Part 6 - Supplementary

17 Fees

- Schedule of fees for ADI tests, licence, retention and entry on to the register.

18 Official title of registered person and certificate of registration

- Official title “Driver and Vehicle Standards Agency Approved Driving Instructor

19 Form of badge

- Form of badge set out in Schedule

20 Exhibition of certificate of registration or licence

- Fixed to and immediately behind the front windscreen of the motor car on its nearside edge and exhibited so that the particulars on the front of the certificate or licence are clearly visible in daylight from outside the motor car and the particulars on the back of the certificate or licence are clearly visible from the front nearside seat of the vehicle, where fitted.

21 (Revoked)

22 Revocations and transitional provisions

- Regulations in Schedule 7 revoked

Schedules

- Schedule 1 Requirements for Test of Driving Technique
- Schedule 2 Licence Conditions

- Part 1 Matters to be Included in Practical Driving Instruction Training
- Part 2 Evidence of Training to be Given to Registrar
- Schedule 3 Record of Instruction Given by Licence Holder
- Schedule 4 Forms of Licence
- Schedule 5 Form of Certificate: Part 1
- Schedule 5A Form of Certificate: Part 2
- Schedule 6 Form of Badge: Part 1
- Schedule 6A Form of Badge: Part 2
- Schedule 7 Revocations

Explanatory Note

## SUMMARY OF RESEARCH FINDINGS

The details of the research are as follows:

- Customer Satisfaction– Driving Test Candidates (Q4 2019/20)
- Impact evaluation of the 2017 car driving test changes: research findings – 11 December 2017 – 17 February 2018 (TRL)
- Learners on motorways evaluation. Q1 interim results (April 2020)
- Lifetime of Safe Driving – a driving instructor perspective
- Lifetime of safe driving – learners phase 1
- Lifetime of safe driving – learners phase 2 (August/September 2019)
- Measuring awareness of the proposed changes to the ADI Part 3 test (August 2016)

Some of the key findings, as they relate to ADIs and learning to drive generally, are as follows.

### Customer Satisfaction– Driving Test Candidates (Q4 2019/20)

#### *Involvement with test*

With regard to the involvement of ADIs with the practical test taken by their pupils

- 15.7% of ADIs sat in on test
- 79.3% of ADIs sat in on the debrief

### Impact evaluation of the 2017 car driving test changes: research findings – 11 December 2017 – 17 February 2018

#### *Lessons with driving instructor*

Research undertaken to evaluate the impact of changes to the driving test in December 2017 (involving more independent driving, instructions by a satnav, demonstrating vehicle functions during the drive and new manoeuvres) included useful information with regard to ADIs and pupils. The survey covered 6800 novice drivers in their first six months of driving. The pass rate of those surveyed was 63.5%, compared with a national pass rate of 45.3%.

Of those surveyed, 98% used an ADI. This is a high take up and underlines the normal practice for learning to drive in Great Britain; that candidates learn from qualified ADIs. This confirms that a key element of the legislation introducing the ADI scheme is being met – that driving instruction of an established quality is available to the paying public.

The research established that mean number of hours learning undertaken with an ADI was 38.7 hours.

#### *Reasons for choosing ADI*

The percentages of those surveyed indicated the main reasons for choosing an ADI were:

- Personal recommendation (family, friends, online sources most common) 57.7%
- The ADI was local to the learner driver 35.8%
- Price of lessons 16.5%
- Already knew the ADI 13.6%
- Familiar company/organisation 10.8%
- Information provided on gov.uk 1.2%
- Other 9.1%

47.3% had undertaken practice with friends/family. This supports the overall view that, as well as paid instruction with an ADI, many candidates learn best also take private practice. Private practice is allowed as long as no payment is made.

## Learners on motorways evaluation. Q1 interim results (April 2020)

### *Driving on motorways*

Learner drivers are only allowed to drive on motorways if supervised by an ADI. The degree to which ADIs are including this in lessons is indicated by the fact that 45% of learner drivers report that they practised on motorways before the test. 46% of learners started having motorway lessons about half way between starting and the test. Half of learners say driving instructors encouraged them to have lessons on motorways

## Lifetime of Safe Driving – a driving instructor perspective (November 2019)

### *Membership of an Association*

Just under half (48%) of those who responded are members of an ADI Association:

- 30% - Driving instructors Association (DIA)
- 12% - ADI National Joint Council (ADINJC)
- 7% - Motor Schools Association (MSA)
- 13% - Other

The type of business are:

- 53% belong to a national driving school
- 51% are independent
- 47% belong to a local driving school
- 36% are a franchise

This finding suggests that almost half of the ADI profession is organised in some way. Whilst these bodies are not trade unions as such, they can represent the interests of the wider ADI community in dealings with DVSA, the regulator, and when considering proposed changes to the Register.

### *Setting of objectives*

97% of ADIs set objectives for their pupils

- 30% set specific objectives
- 66% set broad objectives  
(differs from total because of rounding error)

The top five objectives set by ADIs are:

- Driving with a satnav – 94%
- Independent driving – 94%
- Driving on dual carriageways – 93%
- Driving in residential areas – 93%
- Driving in congested towns – 92%

Timing for setting objectives - ADIs set objectives:

- 18% before lessons begin
- 14% after lessons begin
- 68% bit by bit as required

### *Private practice - encouragement from ADI*

ADIs encourage pupils to get practice by the following advice:

- 77% remind them of their objectives
- 72% talk about safety risks
- 52% tell them they won't have an ADI soon
- 31% tell them the cost of failing
- 10% tell them it is easy to rearrange
- 8% tell them most fail the first time

### *Removal of ADI badge*

ADIs display their ADI badge in the windscreen of their vehicles while instructing. Some remove the badge when they take candidates for test. The experience of those who remove badge is as follows:

- Less than 2 years experience – 5%
- 2 – 9 years experience – 9%
- More than 10 years experience – 14%

The reasons given for removing the badge are:

- Candidate wasn't ready
- Wasn't my candidate
- Signal to examiner
- A matter of principle

### *Post test instruction*

ADIs offer post test instruction as follows:

- 61% always suggest it
- 19% if think they'd benefit
- 18% if the candidate asks
- 2% don't offer post test instruction

### *Readiness for test*

ADIs take an active role in agreeing test readiness of their pupils. They tend to agree with DVSA attitudes towards learner test readiness (that you should only go for your test when ready):

- 93% - tell pupil openly when they are not ready to take the test
- 22% - consider that DVSA's responsibility to ensure only safe drivers pass the test, not instructors
- 11% - feel that ultimately it is the pupils' decision when to take the driving test
- 5% - consider it is worth taking the test if the pupil is not ready – gives them experience
- 4% - feel that, if the pupil takes test before they are ready, no harm done

### *Interaction with parents/guardians*

There can be interaction between ADIs and parents/guardians. In discussions with parents, the percentages of ADIs discussing the following are:

- How parents can support pupils – 85%
- How ready pupils are for the test – 72%
- Progress against objectives – 71%
- What is being covered in lessons – 68%
- How many lessons pupils need – 44%
- Objectives agreed with pupils – 42%
- Reviewing specific lessons – 33%

Attitudes towards private practice and parents observing lessons are as follows:

	Actively discourage	Discourage if pupils bring it up	Encourage if pupils bring it up	Actively encourage	No strong feelings
Private practice	1%	2%	12%	77%	8%
Parents observing lessons	5%	5%	29%	28%	33%

Attitudes towards private practice are as follows:

Disadvantages are seen as:

- Candidates can pick up bad habits 91%
- May face challenges before ready 72%
- Could be at risk without instructor 48%
- Can become over confident 43%
- Pupils may think they can have fewer paid lessons 38%

Advantages are seen as:

- Any additional experience is beneficial 89%
- They can get experience in a different vehicle 75%
- They can get experience to different conditions (eg in the dark) 65%
- It can reduce the number of paid lessons needed 54%
- They can get a different perspective on driving 50%
- It provides a more “natural” experience than lessons 41%
- They can try different routes 37%

Attitudes towards having parents/guardians observing lessons

Disadvantages:

- Pupil may be more nervous than would otherwise be 80%
- The observer may interfere with the lesson 55%
- The observer may contradict the instructor’s advice 49%
- The observer may distract the instructor 30%

Advantages:

- It can prepare observers for giving private lessons 71%
- The observer can see first hand the benefits of paid lessons 65%
- The pupil gets experience of having multiple passengers 62%
- The observer can see pupils’ weaknesses and encourage them to work on them 62%
- The observer will be less likely to “push” the pupil into taking the test 58%

Lifetime of safe driving – learners phase 1 (January 2019)

*Method of learning*

Learner drivers have lessons with ADIs compared with taking practice with relatives or friends was as follows:

- Instructor/relative/friend – 56%
- Instructor only – 34%
- Relative/friend only – 10%

*Amount of training*

On average:

- Young drivers who passed test and had instructor had 25 lessons
- Young drivers who passed test and taught by relatives or friend had 24 hours in car

*How learner drivers chose their ADI*

ADIs were chosen from the following:

- Recommendation from friend/family member 78%
- General internet search 21%
- Social media 10%
- Saw an advert/leaflet on DVSA website 8%
- Other 1%

### *Discussions on what items should be covered*

The following percentages reported that ADIs discussed with them what they were happy to achieve/cover in their driving lessons

- Yes – 62%
- No – 24%
- Don't care/can't remember – 14%

### *What was covered in training*

The following percentages of learner drivers covered these aspects in training

	Yes	No
Driven on dual carriageway	49%	52%
At busy times of day/rush hour	58%	42%
At night/in the dark	52%	49%
On a motorway	23%	77%
In fog	36%	64%
In snow or ice	20%	80%

### *Readiness for the test*

At the time of taking the test (the first one, if taken more than one) learner drivers reported the following readiness to take the test:

	Completely	Somewhat	Not at all
Feel ready to drive on local roads/short journey	60%	33%	6%
Feel prepared for the test	53%	43%	4%
Feel ready to drive on own at night/in the dark	46%	42%	12%
Feel under pressure to pass as soon as possible because of the cost of learning to drive	43%	39%	17%
Feel confident that would pass the test	27%	62%	11%
Feel ready to drive on own after test on motorways and longer journeys	25%	43%	32%
Feel ready to drive on own in snow or ice	15%	45%	41%

### *Young people feeling ready for first driving test*

The following were reported as the biggest factors on making learner drivers feel ready to take the test

- ADI 48%
- No of hours driven/lessons had 13%
- Parents 9%
- How confident I feel personally 8%
- Other 22%

### *Mock test*

70% had done a mock test

**CURRENT FEES AND VOLUMES**

The current fees for the ADI qualifying tests are as follows:

Test type	Description	Fee
ADI part 1 test	Written examination taken as first stage of ADI qualification process	£81
ADI part 2 test	Test of competence to drive taken as second stage of ADI qualification process	£111
ADI part 3 test	Test of competence to instruct taken as third stage of ADI qualification process	£111

The fees for a licence and registration are as follows:

Fee type	Fee
First ADI certificate (or 'badge')	£300
Trainee driving instructor licence	£140
Renewal or re-registration	£300
Replacement ADI certificate (or 'badge')	£3

There are other fees that ADIs can pay for a variety of items. An ADI can apply to join the ORDIT register of those instructing ADIs, the Fleet instructor register or to deliver Pass Plus. These are, however, voluntary and are in addition to the normal requirements of the ADI. They are therefore not included in the assessment of ADIs.

The number of ADIs using the register, reported in DVSA's business plan, are as follows:

Number of the Register	39,000
Standard checks	8,100

The number of planned examinations in the last two financial years, in DVSA's business plan, are as follows:

	2018/19	2019/20
ADI part 1	10,000	10,000
ADI part 1 and 2	14,000	14,500



## **GLOSSARY**

ADI – Approved Driving instructor. Included in the Register of Approved Driving Instructors, and able to deliver driving tuition for payment under Road Traffic Act 1988 and The Motor Cars (Driving Instruction) Regulations 2005 (SI 2005/1902)

ADI Register – the register of ADIs maintained under provisions in Road Traffic Act 1988 and The Motor Cars (Driving Instruction) Regulations 2005 (SI 2005/1902)

ADI Registrar – Registrar in charge of administration of the ADI Register, as defined in Road Traffic Act 1988

Directive 2005/36/EC on the recognition of professional qualifications – provides for mutual recognition of professional qualifications held across different states.

Driving Instruction (Compensation Scheme) Regulations 2012 (SI 2012/1548) – provides for a compensation scheme under the terms of the Driving Instruction (Suspension and Exemption Powers) Act 2009

Driving Instruction (Suspension and Exemption Powers) Act 2009 – provides for the ADI Registrar to suspend an ADI if deemed to present a danger to members of the public

The European Union (Recognition of Professional Qualifications) Regulations 2015 – principal regulations setting out the provisions of mutual recognition of professional qualifications in domestic legislation.

Examinations:

- Written examination (known colloquially as the ADI Part 1) – the first examination taken by a prospective ADI. Comprises a theoretical test taken electronically if driver theory and a test of hazard perception.
- Practical test of ability to drive (known colloquially as the ADI Part 2) – an advanced practical, on-road, driving test.
- Practical test of ability to instruct (known colloquially as the ADI Part 3) – a practical, on-road, test of the prospective ADI's ability to give instruction. Conducted as an on-road lesson with an actual pupil [check].
- Test of continued ability and fitness to instruct (known as the standards check) – a practical, on road check to ensure that standards of instruction are maintained. Conducted as an on-road lesson with an actual pupil [check].

The Motor Cars (Driving Instruction) Regulations 2005 (SI 2005/1902) – principal regulations setting out the detail of the ADI scheme

Road Traffic Act 1988 (Part V) – sets out the high level terms of the ADI scheme, which have more detail in the Motor Cars (Driving Instruction) Regulations 2005/1902

Transport Act 2000 - Added provision for appeals to be heard by Transport Tribunal, for time periods after which decision of the Registrar would apply and methods of appeal. Also introduced ability to introduce regulations which make provision about driver training, introduction of requirement to take courses and fees. Necessary to make regulations to implement provisions.

Road Safety Act 2006 - When commenced, would allow businesses to be registered along with instructors. Registration would apply to different classes of vehicle, not just cars.

## Practical car tests conducted/Passed from 1935

YEAR	TESTS TAKEN	TESTS PASSED	PASS RATE %
1935	246,000	154,636	63
1936	410,622	258,969	63
1937	372,273	234,532	63
1939 to September	430,142	270,990	63
1946 From November	5,873	3,365	63
1947	296,505	172,445	62.4
1948	288,349	188,062	63.4
1949	419,024	181,462	63
1950	505,461	251,565	60
1951	545,822	299,357	59.3
1952	549,690	327,036	59.9
1953	642,986	319,719	58.2
1954	781,988	369,019	57.4
1955	918,306	433,755	55.4
1956 To Nov.	980,240	492,094	53.6
1957 From April	844,773	520,167	53
1958	1,243,570	461,535	54.5
1959	1,413,613	660,716	53.1
1960	1,665,805	751,133	53
1961	1,710,645	855,153	51.4
1962	1,700,583	855,629	50
1963	1,705,668	843,850	49.5
1964	1,983,669	843,362	49.4
1965	1,965,823	948,092	47.8
1966	2,288,441	935,134	47.6
1967	2,192,422	1,067,021	46.6
1968	2,041,442	1,005,168	45.8
1969	1,710,091	937,119	46.4
1970	1,710,098	797,781	46.6

1971	1,588,076	790,498	46.2
1972	1,540,980	742,230	46.7
1973	1,533,816	720,872	46.8
1974	1,677,831	705,717	46
1975	1,825,032	764,565	45.6
1976	1,882,725	828,889	45.4
1977	1,767,828	849,173	45.1
1978	1,632,243	810,796	45.9
1979	1,569,641	757,528	46.4
1980	1,962,034	742,120	47.3
1981	2,031,225	927,795	47.3
1982	2,005,296	966,845	47.6
1983	1,892,315	965,036	48.1
1984	1,784,112	921,008	48.7
1985	1,841,791	875,432	49.1
1986	1,999,738	895,867	48.6
1987	1,981,000	972,067	50
1988	2,001,900	1,028,100	51.0
1989	1,939,300	1,002,200	52.0
1990	1,992,865	1,033,000	52.0
1991	1,803,900	917,800	51
1992	1,957,850	1,002,257	51.2
1993	1,730,990	890,256	51.4
1994	1,635,110	802,931	47.9
1995	1,580,699	796,534	46.9
1996	1,676,800	793,131	45.7
1997	1,772,219	829,672	44.7
1998	1,218,886	587,239	46.7
1999	1,169,002	536,454	45.9
2000	1,129,898	495,512	43.9
2001	1,129,567	496,192	43.9
2002	1,217,498	528,298	43.4
2003	1,348,188	582,274	43.2
2004	1,399,354	598,335	42.8
2005	1,670,302	707,018	42.3

2006	1,908,000	820,440	43.0
2007/08 (Apr-Mar)	1,762,148	779,207	44.2
2008/09 (Apr-Mar)	1,738,992	787,618	45.3
2009/10 (Apr-Mar)	1,533,738	703,859	45.9
2010/11 (Apr-Mar)	1,605,599	744,058	46.3
2011/12 (Apr-Mar)	1,569,069	736,158	46.9
2012/13 (Apr-Mar)	1,436,481	677,255	47.1
2013/14 (Apr-Mar)	1,477,585	695,580	47.1
2014/15 (Apr-Mar)	1,532,504	718,711	46.9
2015/16 (Apr-Mar)	1,537,735	723,444	47.0
2016/17 (Apr-Mar)	1,730,936	815,168	47.1
2017/18 (Apr-Mar)	1,718,519	795,892	46.3
2018/19 (Apr-Mar)	1,664,219	761,972	45.8