THE ROYAL SOCIETY FOR THE PREVENTION OF ACCIDENTS ROSPA

RESPONSE TO THE VEHICLE AND OPERATORS SERVICES AGENCY'S CONSULTATION PAPER

"PROPOSED CHANGES TO MOT TRAINING"

16 MAY 2003

Proposed changes to MOT training – consultation document.

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Vehicle and Operator Services Agency (VOSA) Consultation Document – "Proposed changes to MOT training".

GENERAL COMMENTS

RoSPA welcomes the opportunity to comment on the proposals by VOSA to improve the training provided to people involved in MOT testing.

The MOT test is important in ensuring the roadworthiness of vehicles on the road, and most vehicles on the road are required to pass an MOT Test on an annual basis. However, the quality of the test is dependent on the ability of the testers and the training they have received. It is also important that tests be equitable across the country, with testing everywhere being conducted to the same high standard.

Testing Stations are easily accessible across the country. They are private businesses authorised by VOSA, as the Authorised Examiner (AE), to carry out MOT Tests on their behalf. The AE in turn is empowered to nominate specially trained individuals as Nominated Testers (NT) and it is the Nominated Tester who carries out the MOT Test. Training is provided by VOSA for both categories.

The implementation of the MOT Computerisation system in 2004 provides the opportunity to update the present system of training to meet the additional needs being expected from it, rather than continuing the present system of adding elements on an ad hoc basis as required. RoSPA commends VOSA for taking this opportunity to upgrade the training provided.

RoSPA welcomes the plans to construct courses with interactive teaching methods, which focus on providing delegates with additional relevant and practical experience in addition to the introduction of MOT Computerisation.

SPECIFIC COMMENTS

Initial Course for MOT Testers – NTT(3)

This course will replace NTT (2) and provides a three-day course for prospective new class 3, 4 and 7 (Car and Private Light Goods) MOT testers it includes Computerisation and practical elements

RoSPA Response

RoSPA supports the introduction of the new Initial Course for MOT Testers. This replacement course takes place over three days as opposed to the previous two. The extra time provides an opportunity to include the new Computerisation and other practical elements such as fault location, inspection methods and the test into the course work. It is extremely important that the Nominated Testers who administer the MOT Test have been properly trained to do so and understand the importance of the test in terms of ensuring the safety of vehicles on the road. It is also important that the training covers the practical difficulties that trainees will encounter when doing MOT tests.

Refresher Course for existing car and light van MOT Testers -NTTR

Two day refresher course including some Computerisation and practical elements.

RoSPA Response

RoSPA supports the introduction of the new Refresher Course for MOT Testers. The previous course was one day and included no practical elements. The extension of this course to two days allows time for feed back on observed tests carried out by VOSA staff and for updating delegates on the latest vehicle technologies and their health and safety implications. It is important that Nominated Testers are aware of the safety implications of new technologies.

Initial Course for Motorcycle MOT Testers – NTT M/C

Two day course for prospective class 1 and 2 (Motorcycle) Testers. Includes computerisation and practical elements.

RoSPA Response

RoSPA supports the introduction of the new Initial Course for Motorcycle MOT Testers. The previous course was only for one day and did not include practical elements or computerisation. The introduction of facilities, which will allow trainees to experience a full motorcycle inspection are to be welcomed. It was a significant fault in the previous course that there was no practical element. RoSPA would query why a 2-day course is sufficient for motorcycle testers when the equivalent training for car and light good testers is over three days.

Proposed Motorcycle MOT Tester Refresher Course - NTT M/CR

One day Motorcycle Refresher Course including some Computerisation and practical elements.

RoSPA Response

RoSPA supports the introduction of the new Refresher Course for Motorcycle MOT Testers. There is currently no refresher course for Motorcycle MOT Testers although there is one for class 3 and 4 MOT Testers. The introduction of this refresher course is to be welcomed, bringing as it does an element of parity between motorcycles and car and light goods vehicles. However, RoSPA would again query why this course is half the length of the refresher course for the MOT testers of cars and light goods vehicles.

Initial Course for prospective Authorised Examiners – NTT AE

This two-day course for prospective new Authorised Examiners covers responsibilities including computerisation.

RoSPA Response

RoSPA supports the introduction of the new Initial Course for prospective Authorised Examiners. The present course is one day and does not include computerisation. The new course is based on the MOT Guide with additional information required by the introduction of Computerisation. It is important the Authorised Examiners or their representatives understand the responsibility inherent in carrying out MOT Tests and the benefits the system has for road safety.

Course for MOT Testers who need additional guidance - NTTD

This provides a two day directed course built around the needs of the participants and may include computerisation training.

RoSPA Response

RoSPA supports the introduction of the new Course for MOT Testers who need additional guidance. The present course has limited practical elements and it is planned to improve this in the new course. This course has not been extended in duration and the content will depend on the identified needs of the participants. This course is for Nominated Testers who have demonstrated inadequacies in their testing method, which have been identified by the supervising VOSA Area Office. It is important for testing standards and the safety of road users that such inadequacies be corrected. RoSPA agrees that delegates should re-sit the NTT(3) initial course exam at the end of this course to ensure that they are now up to the required standard.

Facilities for the delivery of training

The addition of a further 10 training sites to provide a wider geographic coverage

RoSPA Response

RoSPA welcomes the addition of a further 10 training sites, which will decrease journey times for candidates. Fatigue is a contributory factor in many road accidents and it is important that Government Organisations such as VOSA make every effort to ensure that they are not encouraging people to drive long distances when they may be tired.

Training Resources

At present VOSA employs 15 technical trainers and proposes to increase this number to 25.

RoSPA Response

RoSPA would query whether an increase of 10 staff is sufficient to implement the planned increase in levels of training and the provision of a further 10 sites. The planned increase in training is between 50 and 100 per cent, and it seems likely that the introduction of new training sites may increase demand for training to some extent.

Funding

The addition of another 10 sites and the recruitment of additional staff will increase the costs involved in supervising the MOT Scheme. VOSA estimate that the increase in costs will be between £750K and £1M

RoSPA Response

There has already been an increase in the pad fee paid by Authorised Examiners to cover the cost of Computerisation. These funds should be sufficient to cover the expected costs.

The Society thanks the Vehicle and Operator Services Agency for the opportunity to comment on this Consultation Document. We have no objections to our response being reproduced or attributed.

Road Safety Department RoSPA Edgbaston Park 353 Bristol Road Birmingham B5 7ST

Tel: 0121 248 2000.