Key concerns and challenges to the Driving Test Booking Service consultation, resultant decision-making and subsequent amendments to Motor Vehicle Regulations.

Introduction

Since lockdown ended, it has been well documented that DVSA have struggled to recover services to pre-COVID levels, particularly in respect of a core agency remit of providing Category B driving tests. Waiting times have risen exponentially over the last five years. Despite successive plans to tackle the backlog, the national average waiting time across the UK has increased from 14 weeks immediately post-lockdown to a national average of 21 weeks.

Whilst it has been widely acknowledged that a key contributory factor to test supply issues is Examiner shortages[1], access to the online test booking platform (known as the Online Booking System, or OBS) has been cited as another major issue. Although DVSA has attempted to take steps to strengthen security (in relation to the OBS), prior to Spring 2025, the measures taken appear to have had a limited impact. An independent cyber-security analyst's report (published in April 2025) highlighted a number of deficiencies in the OBS which allowed bad actors to exploit security gaps with minimal effort[2].

To deepen understanding of the issues faced by users of the OBS, DVSA ran a call for evidence between December 2024, and February 2025. This was followed by a public consultation (May 2025), focused on changing policies that affect car driving test booking rules. This consultation was ostensibly positioned as both making the driving test booking system fairer and giving learner drivers greater control and confidence when booking their test. The proposals focused predominantly on only allowing pupils to themselves to book a test, barring Approved Driving Instructors and other 'third parties' from booking tests and reducing the ability to perform multiple swaps (another exacerbating factor in test resource management the agency had highlighted).

On 12 November, the Secretary of State for Transport announced new measures aimed at stamping out the reselling of driving tests.

Driver training industry stakeholders immediately raised concern at this announcement, particularly in respect of the impact this would have on the profession as a whole, individual trainers and training businesses, and the potential ramifications for road safety. These concerns can be seen in the correspondence that industry bodies, and individual trainers, sent to Ministers and MPs at this time, and in minutes from DVSA/NASP meetings in this period. It should also be noted that between the consultation closing on 23rd July 2025, and the Minister's announcements of the measures to be taken on 12th November 2025, stakeholders were given no substantial opportunity to discuss the consultation responses and resulting measures planned, despite requesting such an opportunity. Stakeholders also requested sight of an output assessment, to understand how the planned measures had been evaluated post-consultation. No output assessment was ever shared, or published, to our knowledge.

[1] National Audit Office Investigation into Car Test Waiting Times www.nao.org.uk/wp-content/uploads/2025/12/investigation-into-car-driving-test-waiting-times.pdf
Parliamentary Transport Select Committee Non-inquiry Session December 2024
https://committees.parliament.uk/work/8622/driving-tests-availability/publications/
[2] https://datadome.co/threat-research/alert-security-gaps-allow-bots-to-exploit-uk-driving-test-booking-system/

DVSA has now progressed amendments to the statutory instrument governing test bookings. The (**Motor Vehicles (Driving Licences) (Amendment) Regulations (SI 2026/326) came** into force on 27th April 2026, passing the changes into law.

In the wording of the amendments to the Statutory Instrument itself are apparent some clear red flags related to the manner in which the Consultation was carried out, and the subsequent decision-making process.

Firstly, in the statement that '*the Secretary of State has consulted with representative organisations in accordance with section 195(2) of that Act.'* DIA feels there is an argument that the Secretary of State did not sufficiently consult with representative organisations most affected by these changes (intensive course providers and trainers of SEND pupils in particular).

A second, major red flag would be in relation to the following statement, contained in the *Explanatory Note* of the amendments:

'A full impact assessment has not been produced for this instrument as no, or no significant, impact on the private, voluntary or public sector is foreseen. Instead, a de minimus assessment has been prepared and has been published, with an Explanatory Memorandum, alongside this instrument on www.legislation.gov.uk.'

Please see item 3) in this report, entitled ***'Insufficient impact assessments, and the true cost to driving schools, and their customers'***. In actuality, a significant cost impact to business was foreseeable and it is our position that a De Minimis assessment was woefully inadequate.

The aspect of these changes which will make it illegal for Approved Driving Instructors (the very professional licensed and regulated by Government, and the key professional who should arguably be further enabled, and not disabled, in acting as a gatekeeper to a driving test and licence) to book tests for their pupils is particularly concerning. This specific change will make it even more challenging for the ADI to play that valuable gatekeeper role, make it difficult for ADIs to support vulnerable pupils who previously relied on their trainer to book their test, and leaves total control of the test booking process in the hands of the 'novice' Learner. Putting the pupil in sole control will not only have further ramifications for test resourcing, but also novice driver road risk as DVSA have already identified a significant change in pupil behaviour (emergent since the test waiting time crisis began) with pupils booking and leaping to take their test much sooner in the learning period - in many cases, sooner than they are ready to actually sit a test and drive independently on our busy, risky roads.

What is even more concerning is that throughout this period DVSA have (in effect) identified ADIs as a key culprit in abuses against the booking platform. This is particularly concerning in terms of the reputation and standing of the profession, but more so (as we will demonstrate in this report) as the regulator has provided scant evidence of ADIs being a significant bad actor in the whole. Fee-paying, Government-sanctioned trainers have not only been made a scapegoat for issues the regulator itself has failed to effectively tackle (in its own systems, processes, and management of resources), hey have been made so on scant evidence, publicly pilloried for these 'crimes' and are now being permanently sanctioned.

This report outlines the serious concerns and questions (those previously raised, and those which have subsequently emerged) the driver training industry has surrounding the consultation process itself, the resultant decision-making and communication thereof. It raises serious challenges about the basis on which decisions were made, and the measures taken.

DIA believes it is critical that stakeholders are appraised of these concerns, as the consequences are deep and far-reaching for the industry, the profession, driver training, testing and licensing, and road safety. They also have ramifications for future consultations DVSA (or related Government functions) may be entrusted to undertake, and any policy and strategy or decision-making which is based on such.

The contents of this report should be borne in mind by any stakeholder (such as Ministers, wider MPs, Members of the House of Lords, Transport Committee members) involved in ratifying these changes being passed into Law and we now ask those same representatives to consider whether objections should now be raised to these amendments.

This report will raise the following questions, concerns and challenges:

- **Where is the actual evidence that ADIs were significant bad actors in the booking process (a claim made by DVSA to justify making it illegal for Government-licenced professional trainers to book tests)?**
- **Why did the consultation not allow for the option of considering closing the booking system to ADIs only?**
- **Was decision-making based on flawed and questionable consultation data?**
- **Was the impact assessment carried out wholly inadequate for the actual cost impact (i.e. a De Minimis assessment being used for a cost impact of > £40 million)?**
- **Did the consultation satisfy the Gunning Principles?**
- **The fact that the measures taken have not halted third-party abuse of the booking process or the exploitation of Learners**
- **Have the needs of SEND Pupils been adequately provided for?**
- **Has decision-making created further risk, and opportunity cost, in terms of further minimising the role of the Approved Driving Instructor as a professional gatekeeper?**
- **Have DVSA unnecessarily damaged the standing of professional ADIs, and the trust between the licensee and the regulator?**

Challenges, concerns and questions regarding the consultation

1) Evidence of ADIs as 'bad actors' in the OBS

A key justification for the barring of ADIs from accessing the OBS to book tests on behalf of their pupils is based on the claim that a significant number of ADIs had been identified as rogue actors in the booking process, either being involved in deploying bots to scrape volumes of test, or in reselling tests at inflated prices, setting up cancellation apps etc.

Indeed, the agency has claimed that it has closed over 1000 accounts in the OBS which had been identified as abusing the system.

However, despite requests for solid evidence that a significant number of these bad actors were unquestionably identified as individual ADIs, DIA has seen little such evidence to

support those claims. Moreover, in meetings which took place between DVSA and NASP during the consultation period, DVSA had previously stated that less than 3% of ADIs were suspected of abusing the OBS.

A key weakness of the OBS is that anyone with access to a DVSA-issued Personal Reference Number (PRN) can access the online booking system. It has been acknowledged that third parties have fraudulently obtained PRNs to access and abuse the OBS, using an ADI's credentials (without the ADI's knowledge), to some degree gained by asking pupils to obtain this information when they engage with the test-reselling sites or scraped by the bots from ADI data sources.

Various other cyber-security weaknesses in the OBS, which could have facilitated third-party access to both pupil and ADI credentials and test booking facilities, have been identified by an independent cyber-security expert report[3]

One such weakness, which enabled non-ADI third parties to access multiple test slots, was their ability to duplicate pupil licence and theory test details and use those to book tests for other individuals, resulting in scammers being able to book tests for more than one individual (as the OBS was not sophisticated enough to detect and stop this practice).

Our counter-assertions to claims the agency has made, in relation to ADI abuse of the booking system, include:

- The c.1000 OBS business user accounts DVSA has stated it has closed did not provably include a significantly high number of ADIs, nor were a significant number of such accounts provably, directly associated with individual ADIs. In fact, many of the accounts closed were associated with completely independent third parties, which had no Approved Driving Instructor status, with these entities fronting as an ADI or pupil and fraudulently utilising actual ADI and pupil information to obtain OBS access, without the ADI or pupil's knowledge and consent.
- DVSA have produced no solid evidence of the number of actual, individual ADIs it has provably found to have been abusing the OBS, or engaged in the reselling of tests
- DVSA have provided no evidence on the above, nor furnished the industry with any verifiable data on the number of Fit and Proper proceedings they have enacted against individual ADIs (and the number of removals and sanctions made) on the specific basis of the ADI engaging in an abuse of the OBS, or in relation to test booking abuse of any nature.

DVSA were specifically asked for this information in a set of FAQs sent to the agency in March (and responded to by the agency on March 18th 2026) and provided no further clarity on the actual number of ADIs found abusing the OBS .[4]

Finally, on the point of blaming ADIs for test booking abuse, it is worth highlighting the following other factors:

- DVSA themselves created OBS security risk by letting anyone who called the Customer Services Unit (CSU) know how to get around the "ERROR15" security message they

[3] DataDome's research into the DVSA booking helpful: https://datadome.co/threat-research/alert-security-gaps-allow-bots-to-exploit-uk-driving-test-booking-system/

[4] 'Changes to the booking system full Q&A' published by DVSA 18/03/26

encountered in the booking process (which occurred if a user tried to undertake too many searches for test slots from one IP address), thus enabling multiple searches, and bookings, from one IP address.

- DVSA themselves were recommending that (in order to obtain a test sooner) people should book elsewhere in the country and advised they could do so by using Apps such as Testi (the swapping app) - effectively promoting the use of third-party apps. If this advice had not been given, it is likely less apps/bots would have been produced and utilised.

- There is evidence of pupils creating bots and deploying them – and pupils still have access to the OBS and no sanctions for use of

2) Why did the consultation not allow for the option of considering closing the booking system to ADIs only?

The key questions asked, in the May 2025 consultation, focused on whether we should continue with the status quo of pupils and ADIs booking tests, or restrict access to allow Learners only to book tests.

A clear challenge DIA, and other representative bodies, levelled at this approach (at the time of the consultation framework being developed, during and after the consultation closed – and this is minuted in stakeholder meeting reports from this period), was the lack of an option asking whether access should be limited to Approved Driving Instructors only?

Given we have a Government regulator-managed system of qualifying, licensing and regulating ADIs, and by that very approach we acknowledge and ratify their professional role (and there is a precedent history of DVSA directly encouraging trainers to play more of a gatekeeper role, with core messaging to ADIs focused on ensuring their pupils are ready for test, ahead of 'allowing' them to book a test), and given the history of both ADIs and Learners being equally allowed to book tests, it is questionable why DVSA did not consider having this option in the consultation, to gauge opinion at least and have decisions makers properly evaluate this option.

Pragmatically, ADI users (given their access to the system and activity within is able to be easily monitored and scrutinised via their licence number and system access credentials) are easier to control and sanction if they abuse the system.

ADIs also fed into the consultation that many pupils prefer their ADI to book the driving test, and that, importantly, some ADIs have pupils who feel unable to book tests for themselves (i.e. pupils with anxiety challenges, SEND, neurodiverse pupils etc). Additionally, given the superior ability of the ADI (verses a Learner Driver, or their parent) to judge actual test readiness from a professional perspective, DIA would also counter that if a core aim of DVSA is to encourage Learners to only book a test when they are ready to pass (and drive independently), it is highly questionable why this option was not at least considered, allowing the ADI to play the gatekeeper role they arguably should.

Accessibility to a test slot, and a driving licence, favouring a Learner's wont to get a test and get on the road as quickly as possible, placing all the choice in the inexpert, novice's hands to judge when they are ready and book a test, should not outweigh the cost of novice driver risk on our roads and supersede the role of the professional trainer as a gatekeeper. Concerns over financial accessibility to a driving licence (i.e. worry that mandating any element of professional training causes too much of a cost burden to the pupil) should not

outweigh road safety risks and costs, road accidents in the UK costing approximately 1.5% to 2.3% of annual GDP, equating to roughly £30–£40 billion in economic losses.

This consultation could have enabled, in turn, a serious (and necessary conversation) about Approved Driving Instructors playing a much stronger professional gatekeeper role in the acquisition of a driving licence, but pupil want was allowed to overtake road safety needs. As is the fear will happen with a current consultation on Minimum Learning Periods, with parents and other supervising drivers signing off learning.

DVSA have, in the opinion of DIA, never answered satisfactorily as to why the option of allowing only ADIs to book tests has not been seriously considered.

3) **Insufficient impact assessments and the true cost to driving schools (and their customers)**

Economic Impact Assessments (EIAs) in the UK are published during public consultations to evaluate how proposed policies, regulations, or projects affect sectors, businesses, and regions.

Throughout this consultation, and resultant decision-making period (and subsequent actioning of those decisions) it has been near impossible to gain a clear picture of what impact assessments were carried out by DVSA, and the results of those. DIA (and the industry steering group NASP) have asked on a number of occasions about both impact and output assessments and been given little response. This is clearly concerning and lacks the transparency that should be expected of a public consultation. These requests are minuted in joint DVSA/NASP meetings, and also raised in letters to Ministers sent by both DIA and NASP)

As the amendments have now passed into Law, we are now able to gain more clarity on the impact assessments carried out. In our opinion, they are woefully inadequate.

In the UK Explanatory Memorandum[5] of the amendments to the Statutory Instrument, it is stated:

'A full Impact Assessment has not been prepared for this instrument because the impact of the measures on business is below the ± £10m EANDCB threshold. A de minimis impact assessment has been prepared and will be published alongside this Explanatory Memorandum on the legislation.gov.uk website. 9.2

The measure is estimated to have an EANDCB of £6.7m over the 10-year appraisal period. This will impact both third party businesses who re-sell previously booked driving tests and those selling driving test cancellation checking and booking services. These costs to third-party businesses are considered savings for households so are considered neutral.

A De Minimis Assessment (DMA) in the UK is a proportionate, self-certified assessment used when a proposed regulatory measure has an estimated impact on business (EANDCB) below **£10 million**. It confirms the measure is too low impact to require a full, independent Regulatory Policy Committee (RPC) scrutinised Impact Assessment.

[5] The Motor Vehicles (Driving Licences) (Amendment) Regulations 2026, Explanatory Memorandum, ***Part Two: Impact and the Better Regulation Framework 9.***

In carrying out a De Minimis assessment, DVSA have held out that the cost impact of the changes to the booking system will be less than £10 million. The reality is the cost impact to business is nearly treble that – in the area of intensive driver training alone.

It is DIA's position, informed by speaking directly to a number of owners of driving schools which operate intensive training courses, that the value of the intensive training market is actually in excess of **£40 million per annum**, meaning a De Minimis assessment was wholly inadequate.

As far as we can ascertain, DVSA did not engage directly with any operator of intensive courses in the space of this consultation to properly gauge the impact on their business and have demonstrated no true understanding of the cost of these changes to this business sector. Yet the agency has openly acknowledged that this is the part of the industry that will be most badly impacted by the changes. Indeed, a blog published by DVSA on 9th December 2025[6], it was stated:

"We recognise these changes will impact some business models, particularly those who offer intensive courses and have built their services around managing the booking process for pupils and customers.

I want you to know we hear your concerns about the economic implications and the impact these changes will have on business models."

However, scant mention of the impact on intensive course providers is made in the Explanatory Note, or in relation to impact assessments in general, and clearly no thought has been given to the cost to the underlying customers, such as we describe below.

It is our view (and that of operators of intensive driving courses) that DVSA have also failed to take into account the economic, and other cost impacts, on the customer base of intensive providers. Intensive driving courses are often utilised by corporate and large volume clients (including public sector bodies such as the NHS) to help employees gain licenses quickly and be able to deploy those individuals in driving roles, or roles which require the employee to drive. These can include carers being employed by NHS trusts who need to be mobile to service patients in the community. We see no evidence of DVSA having calculated the cost impact on those reliant on intensive courses to licence employed drivers, and the on costs of that to the service or products provided.

Given the significant underestimation of cost to this sector, it is highly questionable whether DVSA carried out the right level of impact assessment. It is also questionable, given the agency's stated understanding that changes to the booking system would have a negative impact on intensive course providers, that the agency a) did not investigate more fully what this impact would be and b) make specific provision for intensive schools to still access the booking system.

[6] *'Changes to booking system – understanding views and how these inform the planned changes' DVSA Despatch Blog for Driver and Rider Trainers*

4) Are the changes based on flawed Consultation data?

DVSA have previously claimed that the data used in the Consultation has been robustly collected, cleaned and analysed.

Throughout the Consultation period, DIA have challenged the ability for this Consultation to draw on, and use, fair and balanced responses given the 'expert' respondent community (i.e. ADIs) amounts to only 43,000 people in total and the public response will be far larger. This concern over balance of responses has never been satisfactorily addressed.

However, over the last few months, multiple Freedom of Information (FOI) requests have also been submitted to DVSA concerning how data was collated and analysed, and additional independent testing of the SmartSurvey platform, used for the consultation, has been carried out.

The findings are concerning:

- It is possible to submit multiple responses without effective restriction
- Responses can be distributed across different IP addresses while originating from a single coordinated source
- There appears to be no robust mechanism to ensure responses are unique or representative

By analysing the evidence gathered it seems the data used in this consultation appears vulnerable to manipulation.

This is important because decision-making relied heavily on that dataset. If the integrity of the consultation is compromised, then the evidential basis for introducing legislation, particularly legislation of this severity, becomes highly questionable.

These concerns have been raised with several ministers and their offices, to understand whether there is appetite to examine the reliability of the underlying data. Additionally, this evidence base is now under active ICO investigation, while implementation appears to be proceeding. There are also substantive concerns that the consultation dataset cannot be independently verified as a clean representation of genuine stakeholder opinion. The position being advanced is procedural rather than political: decisions of national impact should not be executed while the evidential basis is disputed and under regulatory scrutiny.

An accompanying report summarising the findings of an independent investigation into the collection and use of data in this consultation has been provided. Please see: ***'DVSA Driving Test Booking Consultation: Evidence and Disclosure Briefing'***

5) The Consultation does not appear to satisfy the Gunning Principles

It is the view of DIA, that the consultation (and resulting decision-making process) does not satisfy at least two of the Gunning Principles governing public consultations (these being the four legal rules that ensure UK public consultations are fair, transparent, and legally sound).

The particular principles that we believe the Consultation fails to satisfy are whether *Sufficient Information (proposers must give enough reasons for proposals to allow for*

"intelligent consideration" by participants) and *Conscientious Consideration (the final decision-makers must conscientiously take into account the product of the consultation)* was given to enable a reasonably informed response.

In terms of *'Sufficient Information'* we have previously stated that we do not believe the driver training profession was aware, at the time of the consultation, that legislation would be changed to make it illegal for ADIs to book tests for people. The majority of trainers simply believed this would be a DVSA policy change. Members have also fedback to us their pupils were unaware of the ramifications of their ADI not being able to assist them with their booking. We are also sure many trainers will not have realised the long-term impact of this move to make ADIs booking tests unlawful. Stakeholders, such as NASP, were not appraised of the move to change legislation until a meeting in March 2026, where it was directly queried by NASP why we had only just been appraised of this, several months after the Consultation closed.

In terms of *Conscientious Consideration,* for many of the reasons already detailed in this report (including challenges to the quality and processing of data, the insufficient level of economic impact assessment, the severe undervaluing of the economic impact on the intensive training market etc) we do not believe that decision makers can argue that they have fully, conscientiously taken into account the product of the consultation.

Due to ongoing concern over the manner in which this Consultation, and resultant decision-making, had already been conducted, and on discovering that DVSA was setting out to enshrine these changes in law and make it illegal for an instructor to book tests, a DIA member survey was launched in March 2026[7]. In this survey, respondents overwhelmingly agreed that they did not feel they had been sufficiently informed to allow for "intelligent consideration" in responding to the Consultation, nor did they feel decision-makers had fully and conscientiously taken into account the product of the consultation.

6) The changes to the booking system have not stopped third-party exploitation

On top of all the concerns, questions and challenges surrounding the Consultation and decision-making process, there is the fact that the measures taken have not entirely fulfilled one of the stated original objectives – that being stopping third-party interference and profiteering from test booking.

Due to an inadequately conceived process for the swapping of tests, within days of the changes taking place, a rash of test swap apps were up and running immediately, some of which are operated by the same third parties who were behind reselling tests.

DIA warned DVSA that third parties would still find a way to exploit the system, and frankly they didn't have to try very hard with the way swaps are being managed. See the link below to an article we published on the emergence test swap apps one day after the changes came into being.

https://www.driving.org/driving-test-swap-apps-emerge-after-dvsa-booking-changes/

The test swap process is unnecessarily complex and cumbersome and has left clear gaps for third parties to still profit from and exploit the system, and pupils.

[7] DIA Member Survey '*Government plans to make ADIs booking tests illegal'* March 2026

7) The risk (and opportunity cost) of further minimising the role of the Approved Driving Instructor as a professional gatekeeper

DIA has highlighted in previous letters to Ministers our deep concern that making it illegal for instructors to book tests for their pupils is yet another step to devaluing the role of Approved Driving Instructors.

At the very same time a new Road Safety Strategy has been published, one that looks at measures designed to improve new driver safety, we further weaken the process to acquire a driving licence by giving the Learner sole power in deciding when they are ready for a test and licensure. These changes have also occurred at the very same time DVSA is telling stakeholders one of the core issues of test supply is increased demand for tests, and consumer behaviour changing as a result of test waiting time issues (meaning pupils are booking tests much earlier in their learning journey) with pupils now leaping too soon for a test. This behaviour underpins the agency's own *'Ready to Pass'* campaign, and its core entreaty to pupils (and trainers) to not go to test until they are ready, with particular messaging to ADIs about their responsibilities in making sure pupils are test-ready when they book.

By disabling ADIs from being able to book tests on behalf of pupils, and making it illegal for them to do so, a clear message has been sent about who is the core decision-maker on test readiness, and that makes it harder for the ADI to have influence on those Learners not yet ready for test (but determined to book one and have a go regardless).

This consultation could have taken the opportunity to explore ADI-led bookings, effectively anointing the professional, licensed trainer as the professional gatekeeper to a driving test and a license many argue they should be. We know the public would likely have not supported this option. However, if the question was asked in the original consultation, at least the option could have been considered by policymakers and questions asked whether test resourcing and supply, and road risk amongst new drivers, would be better managed if ADIs had a stronger role in gatekeeping tests.

8) Have the needs of SEND Pupils been adequately provided for?

We would be remiss in not highlighting in this report the challenges the changes to the booking system present to those pupils who rely on their ADI to book their tests for them, whether that be due to anxiety related, SEND or neurodiversity challenges. Representations have previously been made on this aspect of the changes, and trainers who specialise in this area still feel not enough consideration was given to these particular pupils' needs in this consultation.

In fact, DIA members training in this field have highlighted the fact that no specific provision has been made in the amendments to the Statutory Instrument for SEND pupils to be able to book a test. In communications on these changes, DVSA states that someone else can help a person to book a driving test, but it is arguable that this advice actually contradicts the amendment in law (as this could constitute a third-party booking).

The amends to the Statutory Instrument state:

'An application under paragraph (1)(a) for a practical test prescribed in respect of motor vehicles in category B(3) may not be made by any other person on behalf of the applicant in person."

We'd ask DVSA to point us to the specific provision in the actual amendments which allow third parties to assist with bookings. If it does stand that no specific provision has been made in the amendments in consideration of SEND pupils, it could be argued that there are breaches of the following legislation and regulation:

- **Equality Act 2010**
  Especially the duty not to discriminate against disabled people and to make reasonable adjustments in many situations.
- **The Public Sector Equality Duty (PSED) under section 149 of the Equality Act.**
  This requires public authorities to actively consider how decisions affect disabled people before changing policy or law.
- **Human Rights Act 1998**
  In some cases, failures affecting disabled people may also raise human rights issues.

We'd also ask DVSA to provide evidence of the direct consultation they engaged in with organisations representing pupils and trainers specifically impacted by these changes.

9) **Have DVSA unnecessarily damaged the standing of professional ADIs, and the trust between the licensee and the regulator?**

Industry confidence in DVSA's ability to manage its remit, and not just in terms of test delivery, has significantly decreased over the last few years. DVSA's latest move to publicly characterise ADIs as bad actors in the booking of tests, and to make it illegal for trainers to book a test for their pupil, has further damaged the trust and confidence this core stakeholder group (one which pays millions of pounds in licence fees to DVSA every year) has in the regulator.

Conclusion

In reporting on the above concerns, and raising additional questions and challenges, we do not necessarily seek to overturn DVSA's decision to limit access to the booking system, especially if it can indeed be an effective tool in improving test delivery.

However, we do encourage elected representatives to consider whether the Period of Objection (stipulated as occurring until the 9th June 2026 in respect of these specific amendments) that is pursuant to these amendments becoming Law should now be used to challenge these amendments (before they become binding), and demand that a thorough and independent review of the public consultation, and resultant decision-making, now takes place.

Please also see an accompanying report entitled: '*DVSA Driving Test Booking Consultation: Evidence and Disclosure Briefing*'

About DIA

Driving Instructors Association is the largest professional membership and representative body for driver and rider trainers in the UK, with over 10,000 individual members training across all license and vehicle categories.

Under the DIAmond Advanced Motorists brand, we are also a leading provider of advanced driver and rider testing, accredited by DVSA, and recognised globally as a quality marque in driver training and testing.

Additionally, we operate the biggest media channel in the industry, under the title 'Driver Trainer'.

DIA is also a first-tier consultative stakeholder to DVSA on driver and rider training, testing and licensing matters, as well as ADI and Rider Trainer regulation. We are also an advisory organisation to Department for Transport and involved in a number of driver and rider training, and wider road safety, related working groups.