Our Responses to Key Government Consultations

DIA summarises its formal responses on the proposed Minimum Learning Period for learner drivers and the development of motorcycle training, testing and licensing.

DIA has worked to return two formal responses to Government consultations in May, one focused on the introduction of a Minimum Learning Period for Learners, and one asking for views on the development of motorcycle training, testing and licensing.

What follows is a summary of those responses. We'd like to thank all of our members for sharing with us their views and ideas on both consultations. We collected responses via member surveys and a number of online focus groups where we were able to further explore member thinking on these topics.

Summary of DIA's response to the Minimum Learning Period Consultation

Introduction

Given the statistics for Road Traffic Collisions (RTC) amongst new drivers in the UK are not moving in the right direction (despite multitudes of road safety campaigns and interventions), it is clear that more radical reform is needed in the process of learning to drive. Whilst we do believe a form of Graduated Driver Licensing (GDL) has its place, DIA believes we need to do more to ensure that all Learners are exposed to as much practical experience on road as possible, have the necessary time to acquire life the saving skills and knowledge required to manage the risks of our roads, and acquire this learning from a professional trainer, following at the very least a clearer, modular syllabus (if not a mandatory one), before we grant them a licence at all - and before they can even go for test.

Whilst supportive of the introduction of a Minimum Learning Period (MLP), it is DIA's view that a minimum learning period alone, with no prescription for what development occurs in this period (i.e. just clocking up hours on road, with a 'novice' parental or other supervising driver signing off what the Learner is accruing in terms of skills, knowledge or experience) is not the most progressive approach we are able to take, and we should be braver in taking bigger steps to tackle such a big problem.

We also strongly believe that Approved Driving Instructors, as the Government-licensed and regulated professionals in this context, should be the individuals who ratify pupil readiness for test, and that we should not allow the 'novice' (in respect of driver development) parent or other accompanying driver to act in such a key capacity. 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.

We have gathered views for this consultation response via a member survey, which has had over 800 responses from working driver and rider trainers, as well as holding a number of focus groups with trainers where we explored what a Minimum Learning Period could and should look like. I attach a snapshot summary of those responses.

Summary responses to key consultation questions

Q. In addition to holding a provisional licence and passing a theory test, do you agree or disagree with the introduction of further mandatory requirements for learner drivers before they can take a practical car driving test?

Yes, we agree with the introduction of further mandatory requirements. It is the firm belief of the DIA that improving learner development in the first six months of learning to drive will have a tangible impact on those first six months/year in which they begin driving independently, and when novice drivers are most at risk.

Q. Do you agree or disagree that any new mandatory requirements should include a minimum learning time period between passing a theory test and being able to take a practical car driving test?

Given the statistics for RTCs amongst new drivers in the UK are not moving in the right direction (despite multitudes of road safety campaigns and interventions), it is clear that more radical reform is needed in the process of learning to drive and that a large element of that reform should focus on the pre-test part of the journey.

Summary of DIA's response to the Minimum Learning Period Consultation

Whilst we do believe a form of GDL has its place, DIA believes we need to do more to ensure that all Learners are exposed to as much practical experience on road as possible, have the necessary time to acquire life the saving skills and knowledge required to manage the risks of our roads, and acquire this learning from a professional trainer, following at the very least a clearer, modular syllabus (if not a mandatory one), before we grant them a licence at all - and before they can even go for test.

Mandating a minimum learning period will allow learners to accrue more crucial experience on road in a safer and more controlled manner, and (combined with introducing a modular learning to drive syllabus) will encourage pupils to engage in a more consistent programme of learning, focused on the key areas of novice driver risk.

Set learning periods also allow for the exposure of learners to practice in diverse conditions—such as night driving, adverse weather, and heavy traffic—rather than just preparing for the specific requirements of the test.

There is also evidence that an extended learning period helps curb the "young driver" tendency to overestimate their abilities, ensuring they have sufficient time to develop judgment and hazard perception, not just vehicle control.

Minimum learning periods, anchored on a clear syllabus (as DIA has already designed a modular learning programme, funded by Department for Transport – please see drivermilestones.co.uk), create a more structured, supported pathway, helping learners gain confidence before they drive alone, meaning they are better prepared to be independent, thinking drivers.

Evidence from other jurisdictions, such as Australia, also suggest that longer learning periods can lead to higher practical test pass rates because learners are better prepared.

This is about allowing the time for the learner to build a better foundation of skills, knowledge and experience before we licence them rather than trying to wrest back control over a driver when we've granted them a licence.

Q. In your view how long should the time period be and why?

Six months would be a solid enough period of time to allow learners to gain experience over a diversity of road contexts and conditions (i.e. at least two seasons), cover a sensible, focused curriculum centred on the key risks novice drivers face and be able to accrue a reasonable period of time under instruction and in private practice to feel more competent and confident in driving independently.

Any shorter and it would be challenging for learners to accrue valuable exposure to the diversity of road contexts, conditions and driving scenarios.

Six months is the learning timeline we have based the Milestones learning programme with the six modules being able to be easily achieved in that timeline.

Q. Do you agree or disagree that new mandatory learner requirements should include a minimum number of car driving hours?

In responses to our member survey on a minimum learning period (the results of which have been shared as part of DIA's consultation response) respondents believed that between 40 and 60 hours would deliver opportunity for the learner to develop solid on-road skills, knowledge and behaviour and is a pragmatic amount of hours that could be consistently achieved by the majority of learners.

Summary of DIA's response to the Minimum Learning Period Consultation

On-road training, and exposure to real-life driving scenarios and real time risk is vital in developing the risk management ability of the would-be novice driver. Ensuring all learners are consistently exposed to a level of on-road experience, preferably under the guidance of a professional who can ensure that on-road experience is focused and directed to build on skills and knowledge (and shape the behaviours and attitude) most needed to be a safe and competent driver will deliver a more consistent result in reducing novice driver risks – verses the random and inconsistent

Additional learning could be wrapped around in-vehicle practice by introducing online learning elements and further experience on the road can be accumulated by promoting and encouraging more private practice.

Q. Do you agree or disagree that new mandatory learner requirements should include:

	Agree	Disagree	Don't know
a mandatory modular learning syllabus to complete	✓		
a mandatory logbook to complete	✓		
mandatory e-learning to complete	✓		

DIA strongly believes that a holistic approach to learning to drive will have a greater impact on novice driver safety. We designed Milestones to allow for the delivery of a consistent, accessible and measurable curriculum, unlike what we have now.

Allowing a scenario where you can learn what you want, with who you want, for however long you want with no other goalposts to pass through than one theory and one practical driving test is quite frankly ludicrous, and expecting a better result from such a system is ridiculous.

Having a modular programme based on the key areas of novice driver risk, where all pupils are exposed to the same in-car sessions, guided by a professional instructor who also carries out an in-car assessment at the end of each module focuses both the pupil and the trainer on what ground needs to be covered and the outcomes expected. In the Milestones project we designed this learning and assessment to take place in the average number of lessons pupils undertake now, imposing no extra cost or time burden on the instructor or pupil, but delivering a valuable benefit to trainer and learner.

Backing that learning up with accessible online learning and theory assessments for each module, allows more in-depth exposure to the learning in a way that doesn't impose too much extra a time burden or a cost burden to the pupil, allowing them to study each module in their own time and at their own pace. It also allows for more accessible learning for pupils of all learning levels and ability.

A logbook (similar to that which DIA designed for the Driver 2020 project) would act as a valuable aid in tracking learning and aiding self-reflection in learning. The logbook we designed also ratified learning on road had taken place by linking to GPS information on road location and time spent.

Summary of DIA's response to the Minimum Learning Period Consultation

A selection of member responses to our MLP survey

"The mandatory minimum timeframe, without dedicated and logged minimum driving experience, is meaningless."

"Having the minimum learning period starting from when a theory test is passed could disadvantage some learners. Many have driving lessons but struggle to pass the theory test. They may have been having lessons for a year and be ready to take the practical test, but making them wait another 3 or 6 months (or whatever) from when they pass the theory test doesn't seem right. Perhaps this is where the log book showing a minimum number of hours learning has been achieved might be a better option. How you 'police' this is another matter. Easily open to abuse?"

"All of the above is excellent as long as at least 20 of the mandatory hours are with either adi or pdi. Also should be pushing to say no one presents to test without an instructor. Otherwise just another complete waste of time and energy. "

"Log books, number of hours etc should be signed off by an ADI/PDI."

"Some students are completely ready and very safe before 6 months. Plus some students start to learn to drive before they sit a theory test and have mocks and a levels to study for before theory test so have already learnt to drive for 3-6 months. Some are very dyslexic and find it hard to pass theory but a good driver."

"I agree with the proposal of additional restrictions and evidence capture, the question is who will be responsible for the administration and who would qualify as an approval authority to sign of the modules. If not an Approved Driving instructor then anyone could sign off which turns it into a tick box exercise, however if you mandate ADI's then people are forced to use professional Driving Instructor's which changes the current options completely. Other than that any control which brings consistency of preparation for tests and developing consistent standards is a good thing."

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Response completed by Mark Jaffe, Diamond Chief Motorcycle Examiner, on behalf of DIA and Diamond

The Driving Instructors Association (DIA) responded as the industry body representing training providers within the UK moped and motorcycling, and also as Diamond, a DVSA accredited provider of advanced rider training and testing. Our response was led by our Motorcycle Lead, Mark Jaffe, who is also the CEO of Phoenix Motorcycle Training, the UK's largest training provider, delivering rider training. Our responses were also shaped by, and submitted in conjunction with, other key representative bodies in motorcycling, those being the Motorcycle Industry Association, National Motorcycle Council and National Motorcycle Dealers Association.

We support improvements to road safety, but licensing reform must also improve accessibility, support economic activity, and avoid unintended displacement into illegal or unregulated vehicles, play a key role in improving driving standards and road safety in the UK.

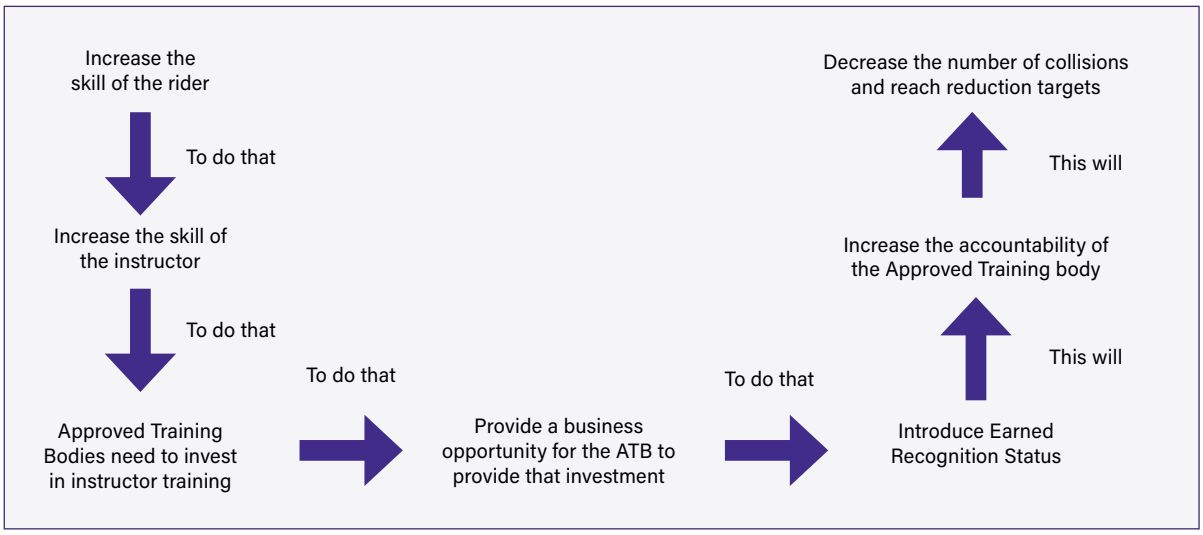
Summary of the key responses

Given how the safety record for motorcycles has evolved since 2013, it is clear that reform is needed, so that the reversal in safety outcomes seen over the last decade can be addressed and progress can once again be made as part of the development of a full L-Category Safe System, something which is currently not in place. This is essential given the role of powered two wheelers and wider powered light vehicles in transport and society, plus the overall contribution that the L-Category sector can make to the Government's broader priorities.

The core purpose of moped and motorcycle testing and training for novice riders is to improve safety. Successive licensing regimes from the 1980 to 2000s did exactly that, but since 2013 progress has slowed on safety and, in the case of motorcycle deaths, these have started to rise again.

It's the firm belief of the DIA, as a professional body representing rider trainers, that improving rider safety through training, will ultimately result in a reduction of road casualties. The diagram below charts out one way that this can be achieved by investing in rider training.

Motorcycle Road Safety Improvement cycle



This way the rider training industry starts a race to the top, rather than the current price driven race to the bottom.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Q.1 Do you agree or disagree that riders who complete CBT on an automatic machine should be restricted to ride automatic-only machines?

Yes. The DIA is aligned with the MCIA, NMC and NMDA support the principle that riders who complete CBT on an automatic machine should be restricted to using an automatic machine. This is a proportionate and logical approach, reflecting the fact that an automatic only CBT does not demonstrate competence in manual transmission control. Conversely, a rider trained on a manual machine will have demonstrated a broader skillset and should therefore be permitted to ride both manual and automatic machines. This distinction is clear, proportionate and grounded in demonstrable competence.

Q.1a If you agree, how should a learner rider, whose CBT entitlement is restricted to riding automatic motorcycles only, be able to upgrade that entitlement to allow them to ride manual motorcycles?

The DIA is aligned with the MCIA, NMC and NMDA on a shorter upgrade course. However, requiring a full repeat of CBT where an automatic trained rider wishes to upgrade to a manual motorcycle is disproportionate. It introduces unnecessary cost, duplication and administrative burden without delivering commensurate safety benefits. A more proportionate approach would be the introduction of a short, targeted upgrade module focused specifically on manual transmission competence. This type of course already exists at many Approved Training Bodies (ATBs) and consists of the current Element C on a manual bike and one hour on the road; this can be the basis of the short course. This approach would preserve the integrity of CBT while recognising that the gap to be addressed is narrow and technical rather than foundational.

Government will also need to provide clear policy direction on the treatment of vehicles capable of both automatic and manual operation. As vehicle technology evolves, ambiguity in this area risks inconsistent interpretation across ATBs and uncertainty for riders. A clear, nationally consistent framework will be essential to ensure CBT entitlement is applied uniformly and remains future proof. This should not be seen as an obstacle to the proposal but as something that must be considered holistically so it is fit for both the present and the future.

Q.2 Do you agree or disagree that DVSA should introduce the motorcycle theory (including hazard perception) test or training to the CBT process? Select one answer only.

Agree. The DIA is aligned with the MCIA, NMC and NMDA. Reform must also be designed to ensure accessibility and inclusivity. Reform must also be designed to ensure accessibility and inclusivity. CBT currently provides an important entry route to independent mobility for a range of users, including individuals with Special Educational Needs and Disabilities (SEND) and those for whom English is not a first language. It is therefore essential that any new testing or theory requirements are designed and implemented in a way that does not unintentionally reduce access to regulated mobility.

There is currently no published UK evidence demonstrating that SEND learners perform less well in theory testing, and in any case the relevant data is not comprehensively collected. However, delivery design remains critical. We are not suggesting that exemptions should be carved out, but rather that Government should engage with SEND specialists and training providers to ensure that any revised framework remains accessible and does not inadvertently create new barriers to participation.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Q.2a If you agree, how should the motorcycle theory and hazard perception test or training form part of the CBT process?

Other option. From a road safety perspective, a theory component prior to CBT is sensible. However, there is a large cohort of riders who rely on 125cc motorcycles for essential transport and who face barriers passing the current theory test due to learning differences, disabilities or special educational needs.

Requiring the current standard theory test for all CBT candidates risks creating a disproportionate negative impact on this group, and may lead to the illegal use of PTW's or eBikes.

Suggested alternative to the Theory test:

- Introduce an approved training program to delivered through classroom-based learning aligned with Ride Free principles, delivered only by ERATBs.(see below about Earned Recognition Status ATB's)

Benefits:

- Provides a supported, adaptable learning environment.
- Removes concerns about online course completion by third parties.
- Continues to meet learning objectives required for safe riding.

The objective must be to set a minimum standard for all road users using the public highways on their own and this can be achieved with the right approach.

Q.3 Do you agree or disagree that DVSA should introduce a progressive access training course to upgrade a riders' licence without the need to complete a further test carried out by a DVSA examiner?

Agree. The DIA is aligned with the MCIA, NMC and NMDA. The current licensing framework has resulted in a significant cohort of "permanent learners" who do not progress into higher licence categories. This reflects a structural weakness in the design of progression pathways, where incentives to advance are limited and progression is not sufficiently embedded within the system.

This is evidenced by the scale of CBT uptake compared with limited progression into AM and A1 categories. Approximately 200,000 CBT certificates are issued annually, yet relatively few riders advance through the licensing hierarchy. In parallel, a greater proportion of riders progress via direct access routes to higher licence categories, with over 5,000 obtaining A2 licences compared to around 35,000 taking direct access to A licences in 2023. This indicates that the current system does not consistently encourage staged development of rider competence.

The DIA, MCIA, NMC and NMDA therefore support the principle of strengthening progression through structured training-based pathways. Rather than repeated cycles of entry-level certification, the system should enable staged competence development through time-limited training milestones. Under such an approach, CBT would remain the entry requirement but would be valid for a defined period, after which riders would progress through an enhanced intermediate training stage prior to final competence assessment for full licensing.

This model embeds progression and reward within the licensing architecture itself. It recognises that rider competence develops over time and through experience and ensures that each stage adds measurable skill rather than repeating baseline instruction. Importantly, it does not require riders to move to higher-powered vehicles if they do not wish to do so; rather, it ensures that those who plan to continue riding at lower licence levels do so with progressively higher levels of competence.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

An enhanced intermediate stage, such as a "CBT Plus" model, should therefore be substantively distinct from CBT. It should build on foundational skills and introduce more advanced roadcraft, hazard awareness, and decision-making, with the explicit objective of preparing riders for full licence competence. This would represent a structured upskilling pathway rather than repetition of entry-level training, and would align the licensing system more closely with modern principles of competency-based progression.

There is also a clear system efficiency argument for reform. The current testing model places significant pressure on DVSA capacity, particularly during peak demand periods. Limited availability of test centres contributes to long waiting times, increased travel distances, and higher costs for both riders and ATBs. These constraints act as a barrier to progression and can discourage lawful access to the licensing system, in turn increasing the attractiveness of alternatives such as non-compliant e-bikes.

A reformed progressive access model should utilise ATBs in delivering structured progression and assessing competence for upgrades, supported by appropriate DVSA oversight and standardisation through the introduction of Earned Recognition, bringing ATBs into closer alignment with other road user training sectors. ATBs already play a central role in delivering CBT and assessing readiness for unaccompanied riding; extending their role in a controlled and accredited manner would be a logical evolution of the system.

International approaches demonstrate that more flexible, training-led progression models can operate effectively while maintaining safety outcomes.

- In Ireland, progression routes allow riders with prior experience to upgrade licences through structured training modules rather than repeated full testing.
- In France, the "Passerelle" system enables A2 licence holders to upgrade after a defined period through a mandatory training course rather than a formal test, focusing on skill development rather than examination repetition.
- In New Zealand, Competency-Based Training and Assessment (CBTA) allows riders to progress based on demonstrated competence, supported by structured instruction and feedback rather than repeated testing events.

These systems demonstrate that licensing frameworks can successfully prioritise structured competence development and progression while reducing unnecessary duplication in testing. They provide relevant models for consideration in the development of a more efficient and outcome-focused UK system.

Finally, progressive access should be understood as part of a wider lifelong learning approach to rider safety, in line with the aims of the Government's Road Safety Strategy. Licensing should not be viewed as a single endpoint, but as part of a continuum of skill development. The Government should therefore consider how post-test training and ongoing rider development can be better integrated into the wider framework, in partnership with the sector, to ensure that competence and safety continue to improve throughout a rider's riding life.

Q.3a If you agree, do you agree or disagree that only a qualified DAS instructor should provide progressive access training?

Partly Disagree. The DVSA already have a post test instructor training qualification which is the Enhanced Rider Scheme . This is designed to focus on 7 core principles and up to 12 additional modules. Instructors are standards checked on this training method so in order to provide quality upgrade training and to ensure the correct standards are maintained, and upgrades should be carried out by someone holding both a DAS and an ERS licence.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Q.4 Do you agree or disagree with the introduction of mandatory syllabuses for these other types of approved training should they be introduced? That would include:

- **A CBT automatic to manual upgrade course**

  Agree. See question 1a

- **A progressive access training course**

  Agree. The current ERS scheme is fit for purpose but would need to be made mandatory. Also see 3a above

Q.4a Do you agree or disagree with the proposed minor revisions that we are suggesting to the CBT syllabus?

Agree. The DIA is aligned with the MCIA, NMC and NMDA and support the proposed minor revisions to the CBT syllabus are supported, as is the principle of removing the syllabus from secondary legislation to enable more responsive updates. However, this flexibility must be underpinned by robust governance arrangements to ensure changes remain evidence-based, proportionate, and subject to appropriate stakeholder engagement.

Q.4b Do you agree or disagree with taking the approved training course (CBT) syllabus out of legislation?

Agree. 4a

Q.5 Do you agree or disagree that there should be changes made to the way in which motorcycle instructors qualify?

Agree. The DIA is aligned with the MCIA, NMC and NMDA and support strengthening instructor qualifications and quality assurance. As the system moves towards a more progression-led licensing model, with ATBs taking a greater role in advanced training and competence assessment, it is appropriate that those providers can demonstrate higher standards and be formally recognised for doing so. A structured recognition framework, comparable in principle to DVSA's Considering options related to the Earned Recognition model, would provide a potentially proportionate mechanism for distinguishing providers that meet the requirements to deliver progression training and assessment. This could include an enhanced designation for ATBs delivering advanced or progression-focused training, supporting consistency and confidence in outcomes.

Any such framework must be accompanied by robust but proportionate oversight. Where ATBs are granted expanded responsibilities in training and assessment, there must be clear DVSA audit, monitoring and quality assurance mechanisms to ensure standards are maintained consistently across the system. This is essential both to safeguard road safety outcomes and to maintain public confidence in a more devolved delivery model. A more flexible system does not reduce the need for oversight; it changes its focus towards outcomes and consistency rather than prescriptive process control.

At the same time, it is essential that any enhanced recognition or accreditation structure remains open, proportionate and competition-friendly. It should not operate as a closed system accessible only to a limited number of providers, nor should it create unnecessary administrative, cost, or qualification barriers that restrict entry. Any ATB capable of meeting the required standards through investment, training and demonstrated competence should be able to attain recognition. The focus should remain on measurable delivery outcomes and rider safety performance, rather than on excessive credentialisation or structural gatekeeping. Care must also be taken to ensure that any framework does not inadvertently consolidate provision in a way that limits market access or reduces training capacity.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Q.5a If you agree, which of these options do you support?

Some other type of assessment. There should be a two part qualification process.

1. DVSA specific motorcycle instructor qualification,
2. The Award in Education and Training (Level 3) which is an entry level teacher qualification and is mandatory requirement in all other forms of adult education. It is a UKAS accredited training course available throughout the country and is therefore accessible to all. This will give instructors the skills to coach learners and raise riders skill levels, which will reduce collisions (see fig 1 above)

Q.5b Do you agree or disagree that existing motorcycle instructors who hold the authorisation to down-train other motorcycle instructors should retain this authorisation once the new qualification assessment is introduced?

Agree, however, the authorisation should be renewed at each point of certificate renewal to ensure consistent ongoing standards.

Q.6 Do you agree or disagree that the validity period of the CBT certificate should be changed from the current two year period?

Disagree. The core issue is not the duration of CBT, but the absence of a clear and structured progression pathway within the system..

Q.6b Should we require a minimum time period after a CBT certificate expires before allowing someone to take another CBT course?

Strongly disagree. The DIA is aligned with the MCIA, NMC and NMDA .The introduction of a mandatory waiting period before CBT retake is not supported. Such a measure would be disproportionate and is likely to have unintended consequences. Access to legal mobility is a practical necessity for many users, particularly younger and lower-income riders. Restricting access is unlikely to improve safety outcomes and may instead increase non-compliant riding, including the use of illegal or unregulated vehicles. This would undermine both enforcement and road safety objectives. A more effective approach would focus on progression, education, and structured upskilling within the licensing framework.

It could also compromise providers such as Wheels 2 Work, who operate subsidised PTW transport for those in rural areas where public transport, walking, and cycling are not viable options.

Banning people for failing to pass their motorcycle test within a set time frame was tried previously in the 1990s, with a ban of a year if the motorcycle test was not passed within two years. This was rightly repealed in 2001 on the basis that the safety case was absent and it was discriminatory to novice riders. It would be a regressive move for this proposal to move forward.

Q.7 Do you agree or disagree with implementing a digital platform for CBT?

Agree. The DIA is aligned with the MCIA, NMC and NMDA .The absence of a digital CBT administration system represents a significant inefficiency in the current framework. A centralised digital platform would improve data quality, reduce fraud risk, and enhance compliance monitoring. A model analogous to the MOT system would provide a logical and proven foundation for implementation, where a redesign of the 'front end' will avoid the need for a costly procurement for a bespoke new system.

Summary of DIA/Diamond's response to the consultation on Improving moped and motorcycle training, testing and licensing

Q.7a What could be the potential benefits of a digital CBT platform?

Agree with all the suggestions in the consultation..

Q.7b What could be the potential drawbacks of a digital CBT platform?

None that we can identify.

Q. 8 How would you be impacted by any of the options in this consultation?

The key to improving safety is to create a training system which has the highest achievable level of trainer accreditation and standards.

The government's new motorcycle road safety strategy provides an important opportunity to significantly raise the quality and consistency of rider training in the UK. A modernised, accountable and professionally recognised ATB network is central to achieving this.

One of the main factors affecting road safety with motorcycles, is the rider themselves. (one of the pillars of the Safe Systems approach). The motorcycle, unlike other road vehicles, has little or no added safety features like cages, air bags etc. Therefore, when training levels are increased, road risk is decreased.

To encourage ATBs to invest in instructor training and business operations you need to create a commercial benefit and create a race to the top rather than the current race to the bottom. Earned Recognition Status does this. (see above)

For many years, the sector has discussed introducing an "Earned Recognition" model for ATBs, but there has been no meaningful incentive for schools to invest in the processes required to achieve higher standards. The MCIAC initiative demonstrated that some schools were willing to invest in external audits and structured quality management, but without tangible commercial benefit, the model struggled to gain traction. As most ATB's thought Earned Recognition was being introduced by the DVSA, they were waiting for that as they assumed they could continue at the lower standard the DVSA would introduce. We need to ensure standards are maintained as high as possible.

The new strategy creates several potential levers through which the DVSA could introduce genuine competitive advantage for high-performing ATBs. Used correctly, these could motivate investment, improve instructional quality, and deliver substantial road safety gains. This is currently the standard in a lot of other regulated industries, outside of rider training, and therefore already has a lot of the quality assurance process in place.

DIA will continue to monitor developments around both consultations closely and keep members informed on any next steps, proposed reforms and Government decisions that emerge from the process.

As always, we remain committed to ensuring that the real-world experiences and professional insight of driver and rider trainers are heard at the highest levels as future policy is shaped.