



# Commercial Vehicle Roadworthiness reform programme

Achieving High Testing Standards  
September & October 2012

# Today's briefing

- Focus of today's briefing: Achieving High Testing Standards (30 min)
  - Key Principles
  - New training arrangements
  - CVR Testing Centre Supervision
  - Risk Based Enforcement
  - Disciplinary Guidelines
  - Measures to Ensure Consistency of Inspections
  - Communications
  - Feedback
- Q&A (30 min)
- CVR Reform Programme General Update (20 min)
- Q&A (40 min)

# Achieving High Testing Standards: Key Principles



- CVR test operators and testers have the legal responsibility to operate in accordance with:
  - The Act of 2012;
  - Any regulations made pursuant to the Act of 2012;
  - Any guidelines issued by the Authority under S. 38 of the Act of 2012; and
  - The Conditions of Authorisation.

This applies to meeting a range of requirements e.g. testing, fit & proper persons, premises, equipment, training etc.

- The Authority monitors CVR test operator and CVR tester compliance
- There must at all times be a clear and unambiguous focus on public safety
- There must be an ongoing focus on CVR test operator and CVR tester competency improvement through continuous education and training
- Fairness and transparency: the RSA will exercise its powers in a fair, transparent and objective manner

# Achieving High Testing Standards: Training



- Training provider: Athlone Institute of Technology (AIT)
- New CPD training is now underway
  - For all existing CVR testers and CVR test operators
  - HGV CPD training will be 1 day per year
  - LGV CPD training will be ½ day per year
  - ADR will be 1 day every other year
  - CVR test operator CPD will be 1 day every other year
- New Initial training courses will commence in early December
  - For new CVR test operators and CVR testers only
- Corrective training will be introduced for those who do not pass mandatory training or as a potential remedy to address non-compliant testing performance.
- All training will be assessed

# Achieving High Testing Standards: Training

- CPD training
  - Practical and theoretical based on topical subjects
  - Smaller ratio of trainer to trainee
- Initial Training
  - Mixture of practical and theoretical
  - Assessed and accredited
- Corrective Training
  - The type of training and re-assessment required will be determined on a case by case basis
- Training fees
  - Directly payable to AIT. Fee information is provided by the training provider (and is included in the Q&A handout provided to you this evening).

# Achieving High Testing Standards: CVR Testing Centre Supervision

- Test centres and testers will be subject to ongoing monitoring involving announced, un-announced and random inspections
- Factors informing the supervisory process will include the outcome of inspections at the roadside and at operator premises
- Different types of inspections will be deployed, including:
  - **Observed Test Inspections:** RSA Technical Inspectors will observe the carrying out of a CVR test in order to assess the quality of the work
  - **Independent Test Inspections:** RSA Technical Inspectors will “stop” a test completing and will require a Full or Visual Re-Test to be completed under observation to verify whether the original result is correct
  - **HGV and LGV Consistency Check Inspections:**
    - carried out by the RSA to assess the consistent operation of test equipment on HGV and LGV test lanes
    - will include carrying out three CVR Test repetitions on each HGV and LGV test lane
  - **Follow-up** CVR Testing Centre Inspections

# Achieving High Testing Standards: CVR Testing Centre Supervision

- CCTV will be installed in CVR testing centres and used to support supervision
- As part of ongoing assessment of compliance with the conditions of authorisation, RSA Technical Inspectors will also inspect:
  - Premises
  - Testing facilities and test equipment
  - CoVIS (IT) assets
  - The roadworthiness of any CVR vehicle present during the inspection
  - Any books, documents, records or data relating to the maintenance and roadworthiness testing of CVR vehicles
  - Test centre's own quality control measures
  - Training records
  - Complaints
  - Compliance with any Directions raised etc.

# Achieving High Testing Standards: Risk Based Enforcement

- *Analysis of testing data* will be used to identify any instances of atypical testing patterns
- *Testing centre Risk Indicator (TCRI):*
  - Each CVR testing centre and CVR tester is given a numerical indicator based on analysis of inspection outcomes
  - Those with a higher risk indicator are supervised more closely and more often than those with a lower risk indicator

Testing centres and CVR testers will be able to view their risk indicators via CoVIS / the test centre portal

- Enforcement Hotline is in place where any concerns in relation to testing consistency and performance can be reported



# Achieving High Testing Standards: Disciplinary Guidelines

- 3 levels of infringements/non compliances: “minor”, “serious” and “very serious”
- The Authority’s disciplinary processes are evidence-based, and therefore only upon such investigation uncovering non-compliance will any disciplinary action be taken
- Formal appeals processes will be in place where a CVR test operator or CVR tester wishes to contest the disciplinary action taken
- *Escalation Process:* Each infringement/non compliance offence type can attract “penalty points” on an escalating scale:
  - “Minor” infringements
  - “Serious” infringements
  - “Very serious” infringements
  - Repeat infringements can lead to the upgrading to a higher infringement

# Achieving High Testing Standards: Disciplinary Guidelines

- Range of remedies/actions available to the Authority include:
  - *Advice and Education* as to the improvement required
  - *Direction Letter* requiring the recipient to perform a rectification task within a set period of time
  - *Corrective training* mandated by the Authority, at the recipients own cost, to address the infringement
  - *Suspension of authorisation to test* which may be applied upon failure to address corrective action(s) or with immediate effect on the basis of the seriousness of the infringement
  - *Revocation of authorisation to test* available to address the most serious of infringements
- Disciplinary Guidelines document will be published in due course

# Achieving High Testing Standards: Measures to ensure consistent and high quality supervision



- A range of measures are being put in place to ensure RSA technical inspection standards are consistent and high quality, including:
  - Adherence to Standard Operating Procedures (SOPs)
  - Ongoing reviews of proficiency of inspectors
  - Rotation of inspectors to ensure impartiality
  - Ongoing training of inspectors
  - Adherence to Key Performance Indicators
  - A confidential feedback service available to test centres and testers
- The Technical Inspection Services will be provided by an organisation independent of the RSA and not involved in testing in Ireland.
- RSA vehicle inspectors may also conduct inspections at test centres as part of their duties.

# Achieving High Testing Standards: Communications



- RSA inspectors to speak with testing centres when visiting and impart latest news and developments
- Seminars
- Frequently Asked Questions on the RSA website
- Testing Centre Portal (when CoVIS goes live)
- Documents setting out your regulatory and legislative requirements including Conditions of Authorisation

# Achieving High Testing Standards: Feedback



- Consultation methods used to date
  - The 2011 test centre consultation process
  - Frequent meetings with the SIMI vehicle tester committee
  - Presentation to the test network through the SIMI AGM and other meetings
- The Authority welcomes feedback from the test network through such informal means as
  - speaking to an inspector, emailing or phoning the RSA, through the RSA website, etc
  - The RSA can be emailed via email on: [cvtadmin@rsa.ie](mailto:cvtadmin@rsa.ie)
  - The RSA website: [www.rsa.ie/RSA/Your-Vehicle/Your-Vehicle-/Commercial-Vehicle-Roadworthiness-Reform1/](http://www.rsa.ie/RSA/Your-Vehicle/Your-Vehicle-/Commercial-Vehicle-Roadworthiness-Reform1/)
- Enforcement hotline
  - 1 890 253 163



# Q&A

# CVR Reform Programme: General Update



- Authorisation of CVR test operators
  - Automatic authorisation of existing authorised testers for 2 years
  - Applications for renewal must be received within 18 months
  - 'Fit and proper person' checks / Premises / competence / ISO & CITA9B / accessibility/ IT linkage included in criteria for acceptance as well as focussing on testing quality standards.
  
- Authorisation of CVR testers
  - Automatic authorisation of existing testers for 18 months
  - Applications for renewal within 12 months
  - Continued authorisation dependent on being a 'fit and proper person', compliance with the conditions of authorisation, meeting testing quality standards, and meeting ongoing training requirements

# CVR Reform Programme: General Update

- Authorisation of new CVR test operators
  - Must be a fit & proper person and meet financial standing requirements
  - Must meet the requirements and conditions of authorisation (premises, equipment, quality systems etc.)
- Key difference: new CVR test operator applicants must pay an authorisation fee
- Authorisation of new CVR testers
  - Must be a fit & proper person
  - Must pass the CVR Test Initial Training relevant to the category of their authorisation



# CVR Reform Programme: General Update



- Fit and proper person
  - Applies to CVR test operator (and, for example, other Directors of the company) and to CVR testers
  - Takes into account convictions for a range of offences
  - Notification of fit and proper must be made at the time of making an application or in the case of a holder of an authorisation, within 3 months of the regulations commencing
- ISO9000/CITA9B Compliance
- Previous performance will be taken into account in the renewal of authorisation of CVR test operators
- Derogations
  - will be reviewed on a case by case basis. In the event that a derogation is now renewed the Test Centre may need to undertake remedial work.

# CVR Reform Programme: General Update



- Testing centre independence approach:
  - In order to test vehicles in which you have a material interest, you must:
    - declare to the RSA any vehicle in which you have an interest
    - notify the RSA of the vehicle test(s) in advance
  - These vehicles will be subject to greater supervision
  - You will be subject to more frequent supervision
  - The policy will remain under review.

# CVR Reform Programme: General Update



- Compliance assessment visits
  - 100 testing centre assessments completed to date
    - Majority well placed to proceed to authorisation renewal in advance of the 18 month deadline
  - Key areas you should focus on (to date) include:
    - ISO9001/CITA9B compliance
    - Certification of level flooring for light testing
- All centres should be visited by end of October 2012
- Where review confirms they are ready, testing centres will be encouraged to renew authorisation as soon as possible

# CVR Reform Programme: General Update



- CoVIS is the new IT system (being developed by SGS) that will support the CVR Programme including linking test lane equipment to the system and linking all test centres to the RSA.
- Benefits for CVR operators
  - automatically feed results from test equipment into the IT system
  - record and manage test appointments including pre-population of vehicle data
  - transmit test results automatically to the RSA on a near-real time basis
  - obtain management information relating to testing performance and outcomes, for the test centre
  - access roadworthiness tester training materials and other information related to roadworthiness good practices
  - reduce admin burden and paperwork

# CVR Reform Programme: General Update



## ➤ CoVIS timeline

- In Design Phase since June 2012
- A number of test centres representatives have been included in the design workshops
- Building & Testing of system from November 2012 to May 2013
- Infrastructure rollout to test centres April to earlier summer 2013
- CVR Test Centre Solution due to go live summer 2013

## ➤ CoVIS deployment

- Approach will minimise any disruption or impact on your business
- Equipment to be installed and ready in advance
- Training to be provided in advance
- A comprehensive and seamless transition to new ways of working will be shared with test centres in advance, covering for example:
  - transition to new booking methods, clients getting CRWs, transition to handling balances etc

## CoVIS – SGS IT Surveys

- 95-100% of all test centres expected to be completed by 28<sup>th</sup> September (dependent on availability)
- Internal SGS review of survey outcomes to be completed during October
- Discussions ongoing and planned with the equipment distributors to discuss survey outcome, technical matters and proposed rollout programme

## CoVIS – Preparations Support

- Minimum standards specification to be complied by SGS and RSA and issued to CVR Network, including:
  - Equipment connectivity
  - Electrical switchboard
  - Physical cabling to equipment
- ElectroAutomation (sub-contractor of SGS) are responsible for the rollout of the IT system and hardware:
  - Begin a first programme of CVR Centre surveys and first fix installations in late November. To be completed by early 2013
  - SGS propose to offer the opportunity to CVR Centres to have a joint visit with their selected equipment provider(s)
  - SGS will contact each individual centre to co-ordinate the visits

## CoVIS – CVR Centre Preparations

- CVR Centres advised to make early contact with their selected equipment supplier(s) to commence planning following the issue of the technical standards document
  - **Significant demand across the network; early planning advised**
- SGS to complete monthly monitoring contacts and/or visit CVR Centres to monitor progress of preparations
- Final Rollout to commence on a planned basis from mid 2013
- **Ultimate responsibility for ensuring preparations in line with the minimum standards and on time rests with the individual CVR Centre**



# CVR Reform Programme: General Update

- Future communications
  - November SIMI AGM update
  - Correspondence regarding:
    - Announcement of transition of supervisory and regulatory powers from Local Authorities to the RSA
    - Issuing of authorisations
    - Issuing of supervisory guidelines
    - Issuing of application forms and guidelines
  - CoVIS announcements (training, roll-out etc.)



# Q&A