2018 - 2019 MOT Annual Training Proposals DRAFT

Following on from 2016-17 and 2017-18, the proposals for this year's annual training to include the following:-

Classes 3, 4, 5 & 7

- 1. Updates to testing procedures brought about by the implementation of Directive 2014/45.
- 2. Guidelines for the safe testing of alternatively fuelled vehicles, including; hybrid, electric and Hydrogen Fuel Cell powered vehicles.
- 3. Test Quality Information and Data Protection.
- 4. Additionally, the MOT Annual Assessment should include elements taken from previous years' MOT Annual Training syllabi and MOT General Standards/Procedures.

Classes 1 & 2

- 1. Updates to testing procedures brought about by the implementation of Directive 2014/45
- 2. Floating Discs and Radial Brakes, Suspension Types & Alignment
- 3. Test Quality Information and Data Protection.
- 4. Additionally, the MOT Annual Assessment should include elements taken from previous years' MOT Annual Training syllabi and MOT General Standards/Procedures.

In detail, Classes 3, 4, 5 & 7;

1. Directive EC.2014/45

An understanding of why this European Directive is being implemented in view of 'Brexit':

Great Britain is still a full member of the European Union and will be until 2019. Until such time, all previously agreed legislation implementation programmes must proceed. Additionally, there are good reasons for ensuring harmonisation of roadworthiness standards across Europe.

Suggested Topics:

A new Inspection Manual
New items added to the test
Removal of some MOIs
Removal of some Reasons for Rejection
New 'deficiency' categorisations; Pass, Minor fail, Major fail, Dangerous
Retests

NB: This is very much draft at present and any /or all of the above may be subject to change.

Unfortunately, the timing of the annual training year and the implementation of the Directive do not coincide. DVSA intend to develop a ghost test environment that will be available for all testers to practice. Participation in this exercise will be mandatory. This can be part of the annual training and

assessment and will be very beneficial for those that complete their annual training and assessment before the Directive implementation date of 20th May 2018. More detail to follow.

2. Alternative propulsion systems

This primarily includes;

- Hybrids
- Electric Vehicles (EVs) and potentially -
- Hydrogen Fuel Cells (HFCs)

Currently, there are only a very few HFCs in the UK. If a testers encounters an HFC for an MOT, he/she should contact 0300 123 9000 (contact centre) for advice on how to proceed.

The focus should be on the first two with an awareness session on HFCs.

Suggested topics:

Common misconceptions:

These vehicles are exempt from MOT Testing

These vehicles are not exempt from MOT Testing other than they are not subject to an emission s test. However, electric goods vehicles up to and including 3500kg first used before 31 st December 2015 are exempt. (NB: This is subject to a current change in legislation that is proceeding)

Special equipment is required to test these vehicles

No special equipment other than the usual MOT equipment is required

These vehicles can only be tested by personnel that have completed model specific training

A refusal to test one of these vehicles on the grounds that it was either a hybrid or an electric vehicle (EV) would not be a valid reason to refuse to test. Any MOT Tester is permitted to carry out an MOT on these vehicle but certain precautions should be taken.

• There is an inherent risk of electric shock when inspecting these vehicles.

This is not true, these vehicles are designed with safety in mind and a normal inspection carries no risk of electric shock

These vehicles can start up without warning and can drive off the vehicle hoist.

This is true; hybrids may start up when the battery level drops and could if not correctly 'powered down'* in 'drive' move off on their own if simple precautions are not taken. This carries a similar risk to 'stop/start' equipped vehicles. The main concern is where the vehicle has so called 'smart keys'.

^{*} Powered Down: This is a general term and manufacturers may use different terms but it is taken to mean the state in which the vehicle cannot start up or move off. This is not the term that is used to describe the condition the vehicle must be in prior to carrying out repairs on the High Voltage system.

What is a hybrid?

Hybrids have two different sources of stored energy available to propel the vehicle. Carbon Dioxide emissions are usually reduced because the applications can use smaller than normal engines and can operate for most of the time in the 'sweet spot' (The rev range where the engine runs most efficiently).

Braking energy that would normally be wasted can to some extent be harvested through regenerative braking – that is, using a wheel driven generator to charge up the batteries, providing retardation.

There are different types of hybrid; series, parallel & series parallel (or 'full hybrid'). Most manufacturers produce at least one hybrid model.

Additionally, there are 'plug in hybrids' and 'range extenders'. Eg Mitsubishi PHEV and Vauxhall Ampere.

Electric Vehicle (EVs)

These are pure electric and have no internal combustion engine, Nissan Leaf, Renault Zoe and the Tesla range being examples.

High Voltage

All of these vehicles will have an electric propulsion system that runs on very high voltage, typically 350 Volts Direct Current stored in the batteries. There is a convention amongst all manufacturers worldwide that the cables to and from these batteries and any high voltage components (this could include air conditioning) are coloured orange. Under no circumstances should these be disconnected or otherwise interfered with unless manufacturer's specific training has been completed.

However, during an MOT, **this will not impede the test**. If the vehicle is correctly 'powered down' – see above, the high voltage system is isolated. In the highly unlikely situation that any of these cables are found to be in a dangerous condition (Eg badly chaffed etc.), the vehicle should fail under Section 1.9 2b or c. The test should also be abandoned.

Carrying out tests that would normally require the engine to be running – eg power steering or brake servo/full power hydraulic systems. For these parts of the test, the vehicle will need to be in the mode that simulates 'engine running mode' or 'ready' and special care should be taken.

Precautions to take.

These are not exhaustive and are intentionally intended to be generic. Training Providers should avoid getting into manufacturer specific detail because they are numerous and likely to vary and this is also likely to encourage methods of inspection that are not recognised in the Inspection Manual.

- Familiarise yourself with the controls before driving or placing the vehicle in the MOT bay or hoist – particularly how to 'power the vehicle down'. You may need to speak to the owner and/or consult the driver's handbook. It might also be a good idea to ask the owner to ensure that the handbook is in the car when taking the booking.
- Assume high voltage battery and associated components are energised and fully charged.

- Ensure that the parking brake, which may be electronic, is applied for all parts of the test that it is not required to be released.
- Never touch the accelerator pedal unnecessarily when the vehicle is stationary some vehicles, if not correctly powered down could move off on battery power without the engine starting.
- Ensure that the assistant is aware of this.
- The use of an assistant is strongly recommended even on one person test lanes or one man testing facilities.
- Do not touch or move orange cables or orange coloured components.
- Ensure that the vehicle is powered down for all parts of the test that do not require the 'engine' to be running or the 'ignition' on.
- Beware when carrying out under bonnet checks that the engine could start at any time if not correctly powered down.

Powering down.

This is not an exhaustive list;

If the vehicle has a simple key operated system, removing the key from the 'ignition' makes the vehicle safe. Ensure the vehicle is in 'park' and the parking brake is applied (electronic or manually operated).

Where the vehicle has a smart or 'keyless' key, ensure that the 'ready' or any other dash warning lamps are not lit, the vehicle is in 'park', the parking brake is applied (electronic or manually operated) and the key is kept at least ten feet from the vehicle.

Where there is a push button system, it is usually possible to scroll through the modes, which are similar to a conventional key system but there is one big difference; there is no 'engine start' mode, the vehicle is ready to drive when in 'ready' mode, which is usually a green symbol (often a car icon) on the dashboard.

3. Test Quality Information and Data Protection

The following 6th Edition guide references can be used as the basis for a training element that covers the above subjects. The objective is for tester to be more aware of the information that is available to them and of their responsibilities for ensuring that data is managed legally.

Testers

E3 Ongoing Requirements

5. Testers should access their Test Quality Information Reports via the MOT Testing Service, to compare their personal performance with the national averages. Testers should note that there may be valid reasons as to why their own personal performance may differ from the national average, e.g. average age of vehicle tested. Comparison where a difference is found should lead the Tester to question why the difference exists.

This is relevant to the tester as it is an ongoing requirement of authorisation.

Authorised Examiners

B6 Quality Management Managing Quality

9. Procedures

You need to ensure that your staff know how MOTs operate in your VTSs – what documents to use, how bookings are operated including the requirements for those vehicles without a current MOT, how to access information such as manuals, guides and reports for example test quality information, test logs, slot usage and transactions etc.

This is under the AE section of the guide but it is important that the Tester knows that the AE is responsible to ensure the Tester knows how to access and use TQI and the benefits than can be gained

B7 Use of Data and Data Protection

1. All persons connected with the MOT Service must comply with all relevant statutory and regulatory requirements, including the Data Protection Act, 1998. It is a requirement of this Act that personal data, which relates to a living individual who can be identified, is kept secure.

This can be used to add further context to the access and appropriate use of TQI data

- 6. In order to safeguard the data, each system user should follow these simple rules:
 - **a.** Do not give another person information that they would not otherwise have access to, this includes test result information.
 - **b.** Do not supply any information to a third party or member of the public unless you are told otherwise in the current MOT Guide, Inspection Manuals or SNs (e.g. providing documents to vehicle presenters). Any requests for information should be made in writing and sent to DVSA's Information Access Team at DVSA Headquarters. See Appendix 9.
 - **c.** Do not access personal information when there is a danger that unauthorised persons may view the information.

Also this can be used to add further context to the access and appropriate use of TQI data

In detail, Classes 1 & 2

1. Updates to testing procedures brought about by the implementation of Directive 2014/45

The Directive changes to the test for motorcycles do not technically come into force until 2022. However, it would be very confusing having two manuals that are formatted differently, and have different categorisations of failures. Therefore, the intention is to have the motorcycle manual in the same format by 20th May 2018. This requirement is therefore the same as for Class 3, 4, 5 & 7

2. Floating discs and radial brakes, Suspension types & Alignment

Testers have previously had a tendency to fail floating discs that were not justified failures. This includes failing the disc for slight side movement at the disc bell bobbins, or comparing the movement on one side with the movement on the other disc in twin disc fitment instead of applying

the failure criteria. Not using the assistant correctly to ascertain the amount of wear in the components.

Get the assistant to sit on the machine and rock the machine back and forward applying the brake whilst the tester can view the amount of wear in the disc bell bobbins.

Radial brake components Pay particular attention to bosses cast into the fork stanchions and the calliper mounting bolts.

Brake controls, span adjusters and aftermarket components. Modified levers (no ball end etc) Thumb control and disabled controls

Suspension types with the many different types of suspension (telelever, paralever, multilink, telescopic forks, girder forks, rotary dampers, twinshock and monoshock) used on a variety of machines testers have to be aware that they have to check them differently for example a machine with a rear Mono-shock type suspension should have the rear wheel raised the rear brake applied and the rear wheel moved to check for play in the suspension bushes or bearings. However if the machine is fitted with only a side stand and the stand used by the test station supports the rear wheel or swing arm there is a risk of this wear being missed.

Front suspension systems on machines fitted with twin wheels (e.g. Piaggio MP3) have more components that are moving and therefore more components that can wear. The tester again faces challenges in raising the font of the machine and the test station equipment may not be the most suitable. The tester may have to adapt procedures to suit and make more use of their assistant and in some cases; they may even have to decline to test the machine if their equipment is not suitable.

Wheel alignment

Be aware that the use of cords to check wheel alignment may not be the easiest method of inspection on machines that already have parallel misalignment as part of their design. For example, some machines fitted with shaft drive and those adapted for use with a sidecar.

When using straight edges of the type that can clamp through the wheel ensure that, the wheel is protected from damage.

What would the effect be of excessive misalignment whilst riding the machine?

- 3. Test Quality Information and Data Protection. This requirement is the same as Class 3, 4, 5 & 7
- 4. Additionally, the MOT Annual Assessment should include elements taken from previous years' MOT Annual Training syllabi and MOT General Standards/Procedures.