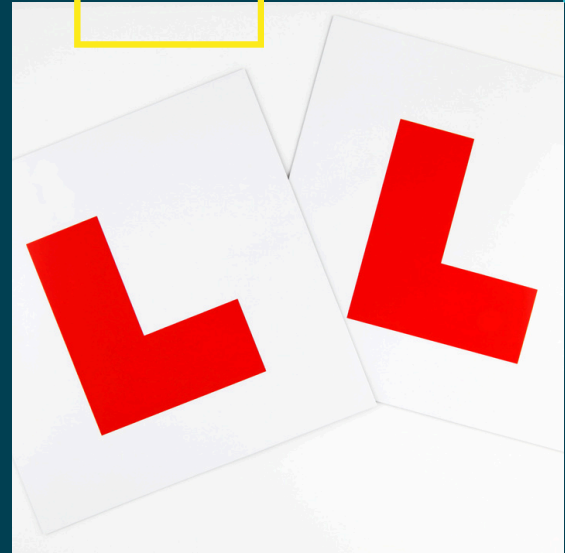




INSTITUTE OF THE  
MOTOR INDUSTRY



# The IMI's Response to the Improving Moped and Motorcycle Training, Testing and Licensing Consultation

May 2026

The professional body for people working and learning in automotive since 1920

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## About the IMI

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The Institute of the Motor Industry is the professional body for the UK automotive sector. We set the standards for technical competence in the maintenance and repair of road vehicles, and through our Professional Register and the IMI TechSafe recognition scheme we identify the technicians who are qualified to work safely on the safety-critical systems found in modern cars, including Advanced Driver Assistance Systems (ADAS), electric and hybrid powertrains, and hydrogen vehicles. Our research tracks the size of the certified workforce against the technology mix on UK roads.

## Headline position

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The IMI's remit covers the technicians who maintain and repair the vehicles people ride, including the increasingly electrified moped and motorcycle parc. We respond briefly to this consultation on the points where the IMI has a direct interest: the standards and digitisation of training, instructor competence, and the read-across to the technician workforce that supports modern motorcycles.

On balance, the IMI supports the direction of travel set out by the DVSA: a digitised CBT regime, tightened instructor qualification, theory testing earlier in the rider journey, and a clearer separation between automatic and manual entitlements. Our caution is reserved for proposals that could compress competence routes, in particular Progressive Access via training without independent assessment, and any proposal to remove the CBT syllabus from primary legislation.

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

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Agree. The skills required to ride manual and automatic machines differ materially, and the increasing electrification of mopeds and motorcycles means that automatic riders are in many cases not learning the clutch and gear-management skills that remain essential for manual machines. Restricting CBT-on-automatic to automatic-only entitlement is consistent with how the car learner regime already handles this distinction.

## 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?

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Through a structured, instructor-led top-up training course delivered by an Approved Training Body, evidenced by a digital record. Upgrades should not require a full repeat CBT but should require demonstrable competence in clutch and gear management on a manual machine.

## **Do you agree or disagree that DVSA should introduce the motorcycle theory (including hazard perception) test or training to the CBT process?**

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Agree. Requiring the motorcycle theory and hazard perception test before or during the CBT process is consistent with the principle that competence should be evidenced at the point of access to the road, not later. The current arrangement, in which a rider can use a CBT certificate indefinitely without ever passing a theory test, is anomalous.

## **How should the motorcycle theory and hazard perception test or training form part of the CBT process?**

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Preferably as a prerequisite to the practical CBT element rather than embedded within it. This preserves the practical focus of CBT, allows ATBs to plan training time efficiently, and ensures that learners arrive at CBT with at least baseline theoretical knowledge. DVSA should consider exemptions for riders who already hold a valid theory test for a related category.

## **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?**

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Cautious agreement, conditional on independent assessment. Progressive Access via training has obvious learner-experience and instructor-economy benefits. The IMI's reservation is that, without an independent assessment element, progression depends on the same instructor who has been delivering the training. The Department should retain a defined assessment standard, even where that assessment is integrated into the training course rather than delivered by a separate DVSA examiner.

## **If you agree, do you agree or disagree that only a qualified DAS instructor should provide progressive access training?**

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Agree. Progressive Access entails the most demanding skill transitions in the rider journey and should be delivered only by instructors qualified to DAS standard. Permitting non-DAS instructors to deliver this training would, in IMI's view, materially weaken the safety case.

## **Do you agree or disagree with the introduction of mandatory syllabuses for these other types of approved training should they be introduced?**

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Agree. Mandatory syllabuses are the most effective tool DVSA has to ensure consistent competence outcomes across the network of Approved Training Bodies. The syllabus framework should reflect modern motorcycle technology, including ABS, traction control, ride-by-wire throttles, electronic stability and electrified powertrains, and the safety competencies their use requires.

## **Do you agree or disagree with the proposed minor revisions that we are suggesting to the CBT syllabus?**

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Agree. The proposed revisions are sensible incremental improvements. The IMI would welcome consultation on a wider syllabus refresh in due course to reflect the changing motorcycle technology mix.

## **Do you agree or disagree with taking the approved training course (CBT) syllabus out of legislation?**

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Disagree. The IMI sees clear value in retaining the CBT syllabus in legislation. A statutory syllabus gives ATBs, instructors and learners a stable reference; permits parliamentary scrutiny of changes; and reduces the risk that future syllabus reductions could be made on operational rather than safety grounds. The flexibility argument for removing it from legislation is, in our view, not strong enough to outweigh those advantages.

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

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Agree. Streamlining and modernising the instructor qualification process is overdue. The IMI's long-standing policy position is that competence-based credentials underpin road safety, and that argument applies as forcefully to the instructors who deliver CBT and DAS as it does to the technicians who maintain motorcycles.

## **If you agree, which of these options do you support?**

The IMI supports the option that combines CBT and DAS instructor assessment into a single course while strengthening, not reducing, the rigour of the assessment itself. Streamlining must not be confused with shortening. Where the consultation offers options of varying rigour, the IMI's position is to support the most demanding competence standard the Department considers operationally feasible.

## **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, conditional on transition arrangements. Existing down-train authorisations should be honoured to maintain instructor capacity, with a defined transition period within which existing authorised instructors must demonstrate equivalence to the new standard.

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

Agree. Streamlining and modernising the instructor qualification process is overdue. The IMI's long-standing policy position is that competence-based credentials underpin road safety, and that argument applies as forcefully to the instructors who deliver CBT and DAS as it does to the technicians who maintain motorcycles.

## **If you agree, please select what the validity period of the CBT should be**

Three years. This balances proportionate reassessment against administrative cost and aligns more closely with comparable validity periods in driver training.

## Should we require a minimum time period after a CBT certificate expires before allowing someone to take another CBT course?

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Yes. A short minimum gap (see Question 6c) discourages repeat-CBT use as a substitute for progressing to a full motorcycle licence, which is the road safety risk the validity period is designed to manage.

## What should this minimum period be?

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Three months. This is long enough to incentivise progression, short enough to avoid excluding legitimate users (e.g. learners returning after a season break).

## Do you agree or disagree with implementing a digital platform for CBT?

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Strongly agree. A paper-based CBT regime is no longer fit for purpose. Digitisation will materially reduce the use of expired or fraudulent certificates and will give DVSA and police the data they need to act on uninsured and unlicensed riding. The IMI's broader policy interest in digital records, for technician credentials, MOT histories and ADAS calibration, applies equally here. The Department should design the platform to be interoperable with the existing rider licence data and with DVSA's wider digital roadmap.

## What could be the potential benefits of a digital CBT platform?

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Reduced fraud and certificate misuse; real-time visibility for police and DVSA at the roadside; better data for safety policy evaluation; lower administrative cost for ATBs and instructors; clearer learner experience; interoperability with insurance and licensing data; and a foundation on which future credentials (e.g. Progressive Access training records) can be built.

## What could be the potential drawbacks of a digital CBT platform?

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Risks include digital exclusion of older or less digitally confident riders, particularly during the transition; data privacy and security exposure, which must be addressed under UK GDPR; ATB onboarding cost; and the risk that platform downtime disrupts training. Each is manageable with appropriate design and transition arrangements; none in the IMI's view outweighs the benefits.

## How would you be impacted by any of the options in this consultation?

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Strongly agree. A paper-based CBT regime is no longer fit for purpose. Digitisation will materially reduce the use of expired or fraudulent certificates and will give DVSA and police the data they need to act on uninsured and unlicensed riding. The IMI's broader policy interest in digital records, for technician credentials, MOT histories and ADAS calibration, applies equally here. The Department should design the platform to be interoperable with the existing rider licence data and with DVSA's wider digital roadmap.

## Further comment

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The IMI welcomes the consultation and the wider intent to modernise. We are happy to provide further evidence on technician workforce data and on digital credentialing standards, and to engage with DVSA on the design of the CBT digital platform from a wider automotive credentialing perspective.



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