

Drink Drive Rehabilitation Scheme (DDRS) Course Approval Evidence Requirement for Wales

An applicant seeking approval to deliver a Drink Drive Rehabilitation Scheme (DDRS) course must provide evidence to demonstrate how they meet the specified criteria.

The initial approval decision will be made on the basis of a desk-based analysis of the evidence provided by the applicant. Specifically applicants must provide written evidence to demonstrate how they meet the specified criteria shown below.

The evidence required for the approval of a DDRS course will comprise the following areas that reflect the layout of the application form (additional guidance is attached):

- Applicant and areas
- Course content and delivery
- Facilities and trainers
- Administrative arrangements

As conditions of approval an applicant must agree to:

- periodically, provide the Welsh Government with data to enable ongoing, risk-based, quality and compliance management
- inform the Welsh Government of any changes to the application at the time of course approval e.g.
 - The legal status of the organisation making the application
 - The key managers and delivery within the organisation
 - The financial or legal status of any of the nominated managers within the organisation
 - Qualifications of delivery staff, e.g. where staff are undertaking training but not yet fully competent
- make a formal declaration of compliance with other relevant legislation e.g. Health and Safety, Employment Law, Data Protection Act
- co-operate in periodic quality assurance and compliance activities as set in DDR Quality Assurance & Compliance in Wales Guidance.

Approval Criteria	Evidence Required
Applicant & Areas (as detailed in Section 1 of the Application Form)	
<p>This section of the application form is largely self-explanatory, although we would advise the following:</p> <ul style="list-style-type: none"> • Details of the key management personnel in the organisation making the application, sufficient to allow the Welsh Government to satisfy itself that there are no other matters which might disqualify them from being appropriate persons to be responsible for an approved DDR course • Details of at least one senior manager who is resident in the UK and who will be the main point of contact, on a day to day basis, for the management of the programme. 	<p>Appropriate evidence would include:</p> <p>Registered name of the organisation – to allow searches in Companies House and/or to ascertain the form of the organisation.</p> <p>Organisational structure diagram e.g. parent company, any other companies in the group – to check for conflict of interest etc.</p> <p>Internal structure diagram e.g. HQ and satellite offices, divisional structure etc – to ensure clarity about reporting arrangements, e.g. in complaints procedure etc.</p> <p>Names of Owner, Directors, Principal Officers - dependent on the structure of the organisation including, specifically, the individual(s) who is/are responsible to the Welsh Government for the performance of the organisation under approval.</p> <p>Other business interests of Owner, Directors, Principal Officers – to check for conflicts of interest and to allow for appropriate checks at Companies House etc.</p>

Course Content & Delivery (as detailed in Section 2 of the Application Form)

Applicants must provide evidence that:

2.1 The course content and learning materials clearly link to the desired outcome of the current Driving Standards Agency (DSA) DDRS Course Syllabus (<https://www.gov.uk/drink-drive-rehabilitation-syllabus>) and ultimately the DSA National Driving Standard (Category B).

The course content links to the theoretical and professional models and adult learning principles which underpin the Syllabus¹.

The course, including the delivery and administration arrangements, aligns with the DDRS course guidance published by the Welsh Government.

Appropriate evidence would include:

Guidance material given to trainers – this should set out clearly the overall objectives of the course i.e. to facilitate and support changed alcohol use behaviour in relation to driving. It should recognise the broad principles of the DiClemente model of change.

(Materials that are focused on ‘improving driving technique’ or which place an emphasis on developing feelings of guilt etc. in the clients are not likely to be acceptable.)

Course outlines, ‘lesson plans’, schedules etc provided to students – the provider should be capable of providing all clients with a clear indication of what is going to be covered by the course and, broadly speaking, when. (Providers have scope to vary their presentation if it is appropriate to do so). Course outlines etc. should broadly reflect the behavioural change models which underpin the Syllabus.

Reference to how the organisation meets the Guide for Course Providers and Courts – this should include relevant policies, processes and procedures, as well as clear indication of what evidence will be provided for audit to demonstrate application and compliance.

Note: the course content, learning materials and outlines/lesson plans should be consistent with the objectives of the DSA Safe and Responsible Driving Standard™ in as much as it would be

	<p>reasonable to see the overall desired learning outcomes of the Standards reflected in course learning materials. We would clearly challenge any content which was in conflict with the objectives of the Standard.</p>
<p>2.2 They have developed appropriate course learning materials which will be provided to course participants.</p> <p>The course they intend to deliver is capable of providing an appropriate, client-centred, response to the learning needs of offenders:</p> <ul style="list-style-type: none"> • taking into consideration different learning styles and varying levels of ability • regardless of their gender, race, sexual orientation, religion or belief and with particular reference to those groups within the category B driving population defined as 'vulnerable' (young persons (17-18 years²), the elderly³ and those with a recognised learning or physical disability). 	<p>Samples of learning materials, including any hard copy, multi-media and on-line materials being used – providers are clearly free to support the delivery of their courses in a variety of ways, including electronically. We would expect to see samples of their materials to:</p> <ol style="list-style-type: none"> a. check that the messages being given are consistent with their own declared strategy and the Syllabus; b. that they are of an appropriate quality; and c. that they are sensitive to the needs of individuals who may have particular learning styles or specific learning difficulties etc.
<p>2.3 Outlines of what additional/alternative material is available for those with special requirements</p>	<p>We cannot reasonably expect providers to give us sight of all the materials that they might be called upon to produce for those with special requirements. However samples would be helpful and we would also expect to have sight of any information that they intend to give to students to explain how to access any special needs provision.</p>
<p>2.4 The course and course materials are available in Welsh.</p>	<p>We do not require sight of course materials in Welsh. However, samples, or an explanation of how Welsh language courses will be provided, will be required.</p>

<p>2.5 The course is available across the region, and is available to those living in rural areas.</p>	<p>We require evidence that courses will not just be limited to the major urban centres. You must demonstrate that you have considered the travel implications that offenders from rural areas will face and have developed an approach to making courses available in all parts of the region. This may include details of the locations you intend to deliver the course from.(see below).</p>
<p>2.6 A recognised method of course and trainer evaluation (such as the Kirkpatrick four level training evaluation model⁴) will be operated in order to confirm, as a minimum, that Reaction (level 1) and Transfer of Learning (level 2) have taken place, demonstrating that each offender has gained a basic level of understanding.</p>	<p>Relevant policies, processes and procedures, as well as clear indication of what evidence will be provided for audit to demonstrate how the organisation is able to evaluate and reflect on how successfully it is delivering the desired learning outcomes.</p> <p>Details of the organisation having an evaluation tool in place. The product of such a tool would constitute one of the key information streams by which the Course Provider and the Welsh Government would monitor ongoing performance. Hence, at course approval stage, a statement that there is a process in place – accompanied by an outline of what the process is – would be sufficient. However, this should be supported by clear indication of what evidence will be provided for audit to demonstrate application and compliance.</p>
<p>Facilities & Trainers (as detailed in Section 3 of the Application Form)</p>	
<p>Applicants must be able to provide evidence that:</p> <p>3.1 They employ, or have access to, sufficient suitably qualified trainers to deliver the proposed course consistently to an appropriate standard.</p>	<p>Appropriate evidence would include:</p> <p>Details of ALL trainers, relevant qualifications and experience. Individual trainers should be able to provide:</p> <ul style="list-style-type: none"> • evidence of formal accreditation e.g. a relevant NVQ level 3

N.B It is not a formal requirement that every member of staff should be able to evidence the full range of competences required to deliver DDRS. For example, individuals may be employed to deliver specific elements of the syllabus e.g. information about crash statistics. In these circumstances applicants must explain how they intend to deploy individual staff to ensure the full requirements of the syllabus will be delivered.

It is also not necessary to provide the names of trainers, just their relevant qualifications/experience.

qualification (or above) e.g:

- Ascentis Level 3 Certificate in Understanding Substance Misuse
- Edexcel BTEC Award and Certificate in Working with Substance Misuse at levels 3 and 4
- City & Guilds Award and Certificate in Working with Substance Misuse at levels 3 and 4.
- City and Guilds Community Justice Award in Drug & Alcohol Services
- OU/FDAP Level Three Diploma in Health and Social Care (Alcohol and Substance Misuse Specialism)

Or evidence of relevant prior experience e.g.

- relevant formal professional membership e.g. FDAP
- substantial prior experience in delivering behavioural change programmes for example within a nursing, criminal justice, social care, youth work, probation or counselling context
- evidence that they are working towards formal accreditation with an appropriate awarding or professional body
(Note this list is not exhaustive)

In addition to formal, alcohol and behavioural change, related competences staff employed should also be familiar with the objectives of the DSA Safe and Responsible Driving Standard™
<http://www.dft.gov.uk/publications/dsa-safe-responsible-driving-categoryb-standard>.

	<p>Evidence should indicate that, for every delivery of the course there is at least one, fully qualified individual, who will have oversight, from beginning to end of the course delivery period.</p> <p>We would expect to check the qualifications and/or relevant experience of individuals delivering the course whenever we carry out an inspection. That check would be (i) about the qualifications and/or relevant experience an individual holds and (ii) more primarily, about whether the course being inspected is adequately and appropriately staffed.</p>
<p>3.2 They have in place plans for the deployment of staff sufficient to ensure the security of all staff involved in delivery and to meet demand in all specified geographical areas covered by their application.</p>	<p>Appropriate evidence would include:</p> <p>Staff utilisation procedures. The staff requirement relates to the provision across the geographical area(s) for which approval is given.</p> <p>Note: There is a particular responsibility in terms of the safety of staff and the management of risk. The Health and Safety Executive notes that: “People who deal directly with the public may face aggressive or violent behaviour. They may be sworn at, threatened or even attacked.” Under The Management of Health and Safety at Work Regulations 1999 employers must assess the risks to employees and make arrangements for their health and safety by effective:</p> <ul style="list-style-type: none"> • planning • organisation

	<ul style="list-style-type: none"> • control • monitoring and review <p>Note: In this context it is assumed that any training organisation will have in place policies and guidance on how to deal with aggressive or violent behaviour and will be able to provide clear indication of what evidence will be provided for audit to demonstrate familiarity, knowledge and understanding of the relevant policies and guidance. It is important that trainers understand what actions they can take to protect themselves and others, both to ensure that they are safe and to ensure that they comply with legal and regulatory requirements and limits.</p>
<p>3.3 They have access to premises which comply with relevant health and safety regulations, are conducive to learning and provide appropriate levels of confidentiality for all those taking part, sufficient to meet demand in all the specified areas covered by their application.</p>	<p>Details of delivery locations, course schedules and staff allocation to those schedules. A provider will clearly have discretion to vary staff allocations according to the contingencies of day to day delivery, but we need to be satisfied that staffing is sufficient to cover the provision approved. .</p> <p>Details of processes and procedures undertaken to ensure privacy and confidentiality etc.</p>
<p>3.4 Processes are in place to ensure all staff:</p> <ul style="list-style-type: none"> • understand their duty of care, and the limits of their competence, in relation to individuals who request further assistance or who present evidence of harmful 	<p>Appropriate evidence would include:</p> <p>A statement of policy and procedures, as would be given to training staff as part of their induction etc in respect of 'duty of care'. We would also expect to see examples of any leaflets or</p>

<p>or dependent drinking and who may benefit from medical support</p> <ul style="list-style-type: none"> • know how to provide guidance to individuals who request further assistance. 	<p>guidance materials used, as well as clear indication of what evidence will be provided for audit to demonstrate application and compliance.</p> <p>Note: It is the objective of the DDR Scheme to change alcohol use behaviour in relation to driving. It is not our objective to stop individuals drinking alcohol. However the providers, and the Welsh Government, do have a duty of care to those individuals who come through the process. That duty amounts to a requirement to respond appropriately to requests for further help of guidance or to suggest an individual seeks guidance where there is a clear indication that there may be a more serious underlying problem.</p>
<p>Administration Arrangements (as detailed in Section 4 of the Application Form)</p>	
<p>Applicants must provide evidence that they have:</p> <p>4.1 Processes in place to capture and respond to customer complaints</p>	<p>Appropriate evidence would include:</p> <p>Process and procedures for handling complaints, including information routinely provided to course participants. This should set out how an individual complains, the timescales in which the organisation will respond and what further recourse they have if they are still dissatisfied.</p> <p>Note: As a general principle the Welsh Government would not want to get involved in the initial handling of complaints. However, as the accrediting body, we have the ultimate sanction. The information provided should therefore also state clearly the circumstances in which the Welsh Government may</p>

	<p>be involved, as specified in the Guidance to Course Providers at section 3.57.</p>
<p>Applicants must provide evidence that they have:</p> <p>4.2 – 4.11 Processes are in place to;</p> <ul style="list-style-type: none"> • Record the number of referred offenders from court • Record the number of referred offenders transferred from and to another DDRS course provider • Identify the percentage of referred offenders who begin the course • Identify the number of referred offenders who successfully complete the course • Identify the reasons referred offenders give for leaving the course before completion • Record the number of ‘exception reports’ submitted, approved and rejected • Record the number of approved exceptions as a percentage of Certificates of Completion • Record and report a summary of course and trainer evaluation findings and related actions • Ensure that all such records are kept accurately and in compliance with the relevant legislation. • Assurance that data collected via these processes will be retained and handled in accordance with the requirements of Data Protection legislation. 	<p>Appropriate evidence would include:</p> <p>A declaration of compliance indicating that the organisation will ensure that they have suitable processes in place. We would expect evidence to be provided for audit inspection to demonstrate application and compliance, as well as accurate and timely provision of information requested as part of quarterly and annual data and financial reporting returns.</p> <p>This data will form a key part of management information for the Welsh Government. It will assist in performance monitoring and help to inform any intelligence led inspections/audits. It may also provide valuable data for research and evaluation purposes.</p>

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- ¹ Applicants are advised to ensure that they are familiar with the theoretical and professional models which underpin the DDRS Syllabus e.g. Prochaska, JO; DiClemente, CC. [Toward a comprehensive model of change](#). In: Miller, WR; Heather, N. (eds.) Treating addictive behaviors: processes of change. New York: Plenum Press; 1986. p. 3–27.
- The Federation of Drug & Alcohol Professionals (FDAP) -http://www.fdap.org.uk/code_of_practice.php ;
- Models of care for alcohol misusers (MoCAM) - http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_4136809.pdf ;
- NOMS Offender Management Model (OMM) – Alcohol Interventions Guidance - <http://www.alcoholpolicy.net/2010/02/noms-alcohol-interventions-guidance-.html>
- Models of care for alcohol misusers (MoCAM) -http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_4136809.pdf; NOMS Offender Management Model (OMM) – Alcohol Interventions Guidance - <http://www.alcoholpolicy.net/2010/02/noms-alcohol-interventions-guidance-.html>
- ² Children and Young Persons Act 1933.
- ³ World Health Organisation accept the chronological age of 65 as being ‘elderly’ or ‘older person’.
- ⁴ Kirkpatrick D, (1994) Evaluating Training Programmes. Berret-Koehler Publishers Inc.