

Vehicle & Operator Services Agency Operations Manual

08.06.09 Section 3 Vehicle Testing Scheme

Operating Instructions

24 – Mystery Shopper Checks

24 Mystery Shopper Check - Description

24.1 Purpose

24.2 Trigger

24.3 Confidentially

24.4 Scheduled Activities

24.5 Campaign Preparation

24.5.1 Vehicle Preparation

24.5.2 Inducing Defects

24.5.2.1 Risk Assessment

24.5.2.2 Authorisation for use of Vehicle

24.5.2.3 Use of Vehicle

24.5.3 Marking MOT Computerisation Record

24.6 VE Preparation

24.7 Conducting a Mystery Shopper Check – General Policy

24.7.1 Unobserved Checks

24.7.2 Observation Point

24.7.3 Impersonation

24.7.4 Challenges

24.7.5 Conversation

24.7.6 Refusal to Watch

24.7.7 Receipts

24.7.8 Scoring Outcome

24.7.9 Recording Observations and Revealing I/D

24.7.9.1 Shortcomings in Test Standard

[24.7.1](#) Threat to Personal Safety
[0](#)

[24.8](#) **Interviews**

[24.9](#) **Reports**

[24.9.1](#) Description of Disputed Defects

[24.10](#) **Recording Outcome on MOT Computerisation**

[24.11](#) **End of Series of Mystery Shopper Checks**

[24.12](#) **Summary of Mystery Shopper Checks**

[24.13](#) **Covert Observations of non Mystery Shopper Tests**

[24.13.](#) Tests Observed Whilst Off Duty
[1](#)

[24.14](#) **Activity Codes**

[24.15](#) **References**

24 **Mystery Shopper Check - Overview**

Mystery Shopper checks are when a vehicle is presented to a Testing Station (VTS) without disclosing that the presenter is an employee of VOSA.

The checks may take the form of

- Observed (Traditional MOTMS)*
- Unobserved with Induced Defects (MOTMSD)
- Observed with Induced Defects (MOTMSD)

(* This can also include observed tests on vehicles which have not been presented by VOSA observed whilst the VE is covertly on the premises.)

This process includes the selection of VTS(s) and vehicle, preparing the vehicle and records prior to test, undertaking the Mystery Shopper checks and processing the results, and finally releasing the vehicle back into service. The operation may be anything between a single test on a single day, to a series spanning several weeks.

24.1 Purpose

A Mystery Shopper test is carried out as an exercise to monitor the procedures and or standards applied by an NT at a targeted VTS.

The type of Mystery Shopper activity used will depend on the perceived problems at the selected site and also previous enforcement activities used.

The Mystery Shopper with Induced Defects is not intended to be used as a routine activity and should only be used where all other avenues have been considered or that this best meets the need due to site constraints. The final decision on the suitability to use this activity must be with agreement of the Area Management.

[Link to withheld information which is likely to prejudice the effective conduct of VOSA's regulatory function under the MOT Testing Scheme](#) (this information has been requested under Freedom of Information and has previously been withheld under section 31(1g & 2d) of the act)

24.2 Trigger

The requirement to carry out a single or series of Mystery Shopper checks can be determined by:

- Scheduled Activity on a VTS where a high scoring attribute suggests compliance is most effectively assessed by means of a Mystery Shopper check
- Complaints
- Intelligence data

24.3 Confidentiality

VOSA are often contacted by members of the public wishing to pass on information about MOT Garages. Intelligence information may be given to VOSA in person, via fax, telephone, email or letter.

VOSA have a duty of care to ensure that the identity of those members of the public and members of staff who pass on information that could be subsequently used in any investigation are adequately protected and section 22.2 – [Receiving MOT Intelligence](#) must be referred to.

24.4 Scheduled Activities

It is expected that the major source of Mystery Shopper checks

will be from those VTS listed on the monthly Activity Schedule where the high scoring attributes of the VTS may warrant a Mystery Shopper check in preference to the default MOT55. Where an AO wishes to carry out Mystery Shopper checks as a campaign, in order to achieve minimum numbers, targeted Mystery Shopper activities may be deferred for up to two calendar months to allow a sufficient number to accumulate to make an exercise worthwhile. Adjoining Areas may also consider sharing Mystery Shopper vehicles and exercises to improve efficiency.

Note: Areas may check the MS activities pending by requesting a Campaign Report however the report will only include Mystery Shopper checks that have been added to a VTS Plan (refer to [Appx 11.2\(50\)](#))

24.5 Campaign Preparation

Determine who is available and capable within the required period to observe tests and take action, or just present a vehicle for possible observation by another. This may be a VE, SVE, Area Manager or any other suitable member of staff.

Note: When conducting MOTMSD activities the vehicle can only be driven on the public road by a Vehicle Examiner.

The relevant person will need to have funds arranged through Finance at Swansea (refer to section 12.10 - [Financing Mystery Shopper Checks](#) for details). **Note:** Petty Cash must not be used.

24.5.1 Vehicle Preparation

Before a Mystery Shopper check is carried out the VE must:

- Ensure that the Mystery Shopper vehicle is fit for the purpose. An inspection (e.g. at a VOSA site) should be carried out to MOT standards and recorded on MOT Computerisation, using 'Register Vehicle (VE) - Non MOT', this will allow the production of a VT32 which will record any defects and advisory items found and this should be included in any report submitted. If defective items exist that would fail MOT test standards, these must be assessed against the Categorisation of Defects. Those that would attract an Immediate Prohibition must be rectified or an alternative vehicle sought.
- Satisfy himself that any induced defects from a previous series of checks are the same as documented in the Defect Commissioning Report prior to use (see below).
- If a windscreen reminder is displayed then it must be amended to display the selected fictitious MOT expiry date or be removed. **Note:** VOSA staff must not use their own

vehicles or those in which they have an interest for conducting 'Mystery Shopper checks'. It is considered that such involvement could put the Agency's integrity in question and compromise our impartial consideration of any subsequent disciplinary action.

- Mark the vehicle on MOT Computerisation.

MOTMSVP should be booked to cover any preparation

24.5.2 Inducing Defects

[Link to withheld information which is likely to prejudice the effective conduct of VOSA's regulatory function under the MOT Testing Scheme](#) (this information has been requested under Freedom of Information and has previously been withheld under section 31(1g & 2d) of the act)

24.5.2.1 Risk Assessment

A risk assessment should be recorded in Part 4 of Defect Commissioning Report of all known or added defects on the vehicle. Mitigating action that should be recorded and complied with while the vehicle is in use.

The mitigating action must be agreed with the SVE/SM (HPTO). For example; if you remove a seat belt buckle, the mitigating action is to ensure that no passenger will use the specified seat. Mitigation may include that certain spare parts are contained within the vehicle (bulbs/wiper blade etc) or that an arrangement is in place if the need arises to have the vehicle recovered.

24.5.2.2 Authorisation for use of Vehicle

This must be completed by the Area Manager in Part 5 of the Defect Commissioning Report. This confirms that the vehicle has been fully inspected and any defects on the vehicle have been identified, and a risk assessment and mitigating actions have been agreed to ensure that road safety and safety of the Examiner will not be compromised. (Where the Area Manager is unavailable this can be completed by either an adjacent Area Manager or person with delegated responsibility).

24.5.2.3 Use of Vehicle

A mystery shopper vehicle with induced defects can **only** be used on the public road by a VOSA Vehicle Examiner. The vehicle cannot be driven on the public highway by admin staff or Traffic Examiners. The use of the vehicle must be restricted to driving to and from Mystery Shopper checks.

The Vehicle Examiner must carry with him his pocket book. The pocket book must contain sufficient details of the vehicle, defects and site to be visited.

24.5.3 Marking MOT Computerisation Record

[Link to withheld information which is likely to prejudice the effective conduct of VOSA's regulatory function under the MOT Testing Scheme](#) (this information has been requested under Freedom of Information and has previously been withheld under section 31(1g & 2d) of the act)

24.6 VE Preparation

A new person taking on a current Mystery Shopper vehicle should ensure that the allocated vehicle is still within the Mystery Shopper date range on MOT Computerisation. This should be advised to them by the relevant administrative staff member or by checking MOT Computerisation themselves using 'Select or Extend Mystery Shopper Vehicle' at which time they can amend the User I/D to their own.

In addition each Vehicle Examiner should satisfy themselves of the condition of the vehicle and any induced defects as documented in the Defect Commissioning Report prior to use.

The VE may wish to consider printing the photographs of NTs at the VTSs subject to Mystery Shopper checks to assist him in tester identification. This can be achieved via 'View Person Details > Photograph'.

[Link to withheld information which is likely to prejudice the effective conduct of VOSA's regulatory function under the MOT Testing Scheme](#) (this information has been requested under Freedom of Information and has previously been withheld under section 31(1g & 2d) of the act)

24.7 Conducting a Mystery Shopper Check - General Policy

Vehicles should normally be submitted for test by appointment, however ad-hoc tests can take place providing no pressure is placed on VTS personnel. If for some reason, the VTS concerned cannot carry out the test at an appointed time, it is important that another appointment is made; no pressure should be imposed to have the test carried out quickly or at once. The reason for the failure to test should be obtained without arousing suspicion as this in itself could attract disciplinary points under [Appendix 8.4C of the MOT Testing Guide](#). VE's should be conscious of acting 'correctly' in order to avoid any accusation of

“agent provocateur”.

Aborted checks should be booked to MSA.

24.7.1 Unobserved Checks

The vehicle will normally be submitted for an MOT Test by appointment and collected later that day. **Note:** If the presented vehicle has defects, only a VOSA Vehicle Examiner can drive the vehicle on public roads however other staff may be used to ‘present’ it once at the VTS.

On returning or completion of the test the NT’s result and documentation should be compared to the known condition of the vehicle. This may alternatively be done by using MOT Computerisation before returning to the site.

If shortcomings in test standards have been identified the VE should disclose his identity and the nature of the activity, and ask to speak to the AEDM/SM and NT or their representative.

24.7.2 Observation Point

Ideally the test should be observed from the official viewing area however at VTS where an ‘open door’ policy is permitted, the observation can be made from any vantage point if this is less suspicious. This, however, must be recorded in the report and any observation disadvantages or obstructions also recorded.

24.7.3 Impersonation

VEs must be able to check that the NT carrying out the test was the owner of the Smart Card being used as impersonation appears to be a trend to hide excessive test throughputs where a colleague is on leave or to allow ‘disqualified’ NTs to carry on testing under a colleague’s name.

Identification of the NT should be made by checking photographs of the staff on MOT Computerisation before the test or by checking the VT26 after the test.

If impersonation is suspected it is important for the VE not to reveal his ID before asking to see the NT again if he is not the one handing over the documentation as the owner of the Smart Card may make an appearance, suggesting that the VE was mistaken. If the owner of the Smart Card is on site he also needs to be interviewed regarding the ‘loss’ of it and his password.

24.7.4 Challenges

Should the VE be challenged at any time during the visit as to his identity, it is acceptable that a plausible cover story can be used to reduce the possibility of a direct challenge. A summary of the cover story should be included in the VE's notebook and the report.

24.7.5 Conversation

The VE should act as naturally as possible however any conversation should be lead by the NT or assistant and the VE should be guarded in his comments if these could be considered to develop a conversation and hence lead to accusations of distraction.

24.7.6 Refusal to Watch

If the VE is obstructed from viewing the test in any manner he should show his official identification (warrant) and carry out an MOT6, reporting the circumstances of the case.

24.7.7 Receipts

The test fee should be paid in all cases and a receipt obtained unless this would arouse further suspicion following satisfactory checks. In these exceptional cases, the AM or SVE must sign the [Mystery Shopper Balance Sheet](#) in the Receipt No space.

24.7.8 Scoring Outcome

VEs should not disclose their identity at Mystery Shopper checks unless they have observed shortcomings which are likely to result in formal disciplinary action. Outcomes considered to be Minor Shortcomings ('Minor Discrepancies' on MOTCOMP) will be dealt with by means of an Alert Message and a MOTDSV from the home VE (see [24.10](#)). Shortcomings likely to attract up to 10 points are considered to represent a Satisfactory outcome.

24.7.9 Recording Observations and Revealing I/D

If the test is unsatisfactory after the test certificate or VT30 has been issued the VE should record his observations as soon as possible. It is acceptable for him to briefly leave the site to record the observations in his note book or interview record, giving each deficiency a reference, which can be referred to in the interview. If upon his return the NT is not engaged in another MOT, the VE should show his official identification (warrant) and reveal his identity to the tester and/or SM/AEDM or responsible person on site.

24.7.9.1 **Shortcomings in Test Standard**

Where there are shortcomings in test standards being applied, the vehicle should be re-examined in the presence of the AEDM/SM and NT to confirm the existence of the induced defects and determine the condition of the vehicle. **Note:** This may not necessarily lead to a full re-examination; only the missed defects or contested defects need be demonstrated as evidence of the vehicle condition at the time of test.

Once the examiner has disclosed his identity he should remain with the vehicle until any re-examination has taken place and shortcomings identified to the NT. This is to prevent any attempt by a third party to repair or mask defects and so undermine any possible disciplinary case.

Any re-inspection should where possible be conducted in a 'like for like' fashion. Any hand written advisory documentation should be requested before conducting the re-examination.

If, during the inspection when demonstrating the induced defects additional defects are found, the VE should record these in his pocket book. It is important when dealing with corrosion that had not been found during the MOT test that no attempt is made to further assess the defect without the AEDM/SM and NT being present.

Examiners may wish to photograph defects to confirm their existence at the time of the re-examination.

24.7.10 **Threat to Personal Safety**

If at any stage the VE considers his safety is a risk, he should withdraw and make alternative arrangements to ensure that the incident and concerns arising from the test are brought to the attention of the AEDM/SM and NT as quickly as is practical in the circumstances. The circumstances of the situation should be documented.

24.8 **Interviews**

Where formal disciplinary action is considered, an interview must be carried out. Refer to section 40 – [Interview Procedures](#) for details.

24.9 **Reports**

Mystery Shopper reports should be completed using the appropriate form (VT54 or VT54ID) available on the VOSA Documentation menu and submitted to the Area Office within one

week of the check with the relevant original test document and any interview record.

It must include all relevant observed test discrepancies **that were cited in interview**. Deficiencies that were remembered later should not be included.

All the facts of the activity must be recorded (e.g. breaks in observation, conversations, possible distractions etc), the AE or NT should not be able to supply additional information in their representations.

If the VTS is authorised to use one person testing (ATL and OPTL) ensure the appropriate section of the VT54 form is annotated to show whether the one person test lanes were automated (ATL) or manually operated (OPTL).

All Mystery Shopper reports of any outcome should be referred to the AM's or SVE's attention.

24.9.1 Description of Disputed Defects

In cases of apparent unjustified failures or missed defects it is important that the condition of the subject components is fully described in order that a third party can independently assess the condition for themselves, especially where the component condition cannot be photographed. Refer to section 30.9.1 – [Defect Descriptions](#) for further details.

24.10 Recording Outcome on MOT Computerisation

The result of each Mystery Shopper check is recorded on MOT Computerisation using the function [Record Mystery Shopper Observation](#) however as this input can generate an Alert message to the NT and AE, it should not be input until the report has been processed through the AM or SVE as alerts, although delayed to the recipient, cannot be recalled after issue.

- Identify the test record of the test that was observed and set the marker to show it was observed. **Note:** Care must be taken in inputting this as any incorrect number may be accepted. It is suggested that the VT20 or VT30 is used as a source document and not the report.
- Record the outcome of the Mystery Shopper check i.e. satisfactory, minor discrepancies (= minor shortcomings) or unsatisfactory.
- If the outcome recorded is satisfactory the system will randomly send a message between 28 and 42 days after the test to the AEDM and SM of the VTS. The message will inform them that a member of VOSA acting as a 'mystery shopper' observed a 'recently' conducted test by the NT. The message will say either that the test was found to be

satisfactory (refer to Appendix 6 - [Alert 42](#)) or was found to include minor shortcomings (refer to Appendix 6.2 - [Alert 43](#)). Alert 43 is also copied **at the same time to the VE(s)** in whose Zone the VTS is located so that this will trigger him to arrange an MOTDSV visit (refer to section 33.2 – [MOTDSV](#)).

It should be noted that there is no Alert connected to an unsatisfactory Mystery Shopper check as the relevant parties will be advised at the time of the check and will be sent formal letters. It is important that the home VE applies the same retraining policy as outlined in Alert 43 where an NT receives a Warning Letter with no requirement to attend an NTTD.

24.11 End of Series of Mystery Shopper Checks

At the conclusion of the series of Mystery Shopper checks the vehicle must be de-allocated on the system using [Deselect Mystery Shopper Vehicle](#) in order to have its dummy record cleared.

The vehicle must have all known induced defects rectified and restored to its service condition (this may include all defects identified during its use). These should be checked and confirmed by an Examiner and signed off in Part 6 of the Defect Commissioning Report.

Once this is completed the vehicle can then be returned for normal service use.

A copy of the Defect Commissioning Report and MOT Computerisation documentation should be retained by the Area Office and filed in an appropriate file for future audit purposes.

24.12 Summary of Mystery Shopper Checks

An overnight report can be obtained showing all of the Mystery Shopper tests (one per page) by calling off the [Vehicle Test Report](#), keying in the test number of just one of the Mystery Shopper checks. To limit the scope of the report, the start and end dates of the required range of Mystery Shopper checks need to be entered.

Note: the report does not show any VT32's issued.

24.13 Covert Observations of non Mystery Shopper Tests

The subject vehicle of an MOT test does not have to be 'marked' as a Mystery Shopper vehicle in order to record a Mystery Shopper observation. 'Marking' of a vehicle only hides the previous test history, prevents a genuine test record being placed on the database and sets the various Mystery Shopper Alert

processes. Where a genuine test is witnessed as a covert exercise, it can still be recorded as a Mystery Shopper Observation by inputting the Test Number. It is expected that only unsatisfactory examples of such ad-hoc observations will be noted and recorded, thus in such cases no Alert message would have been generated in normal circumstances.

Note: The recording of an MS check on an 'unmarked' vehicle will not be recognised as a planned enforcement activity for the purposes of completing a scheduled MS activity nor as an equivalent activity. Where there is a scheduled activity, this must be cancelled and a comment recorded (refer to section 37.5.2 – Closing activities on a VTS Plan).

24.13.1 Tests Observed Whilst Off Duty

If a poor quality test is observed "off duty", it should be reported for an official Mystery Shopper check. If technical staff observe the whole test, and if they have their warrant and note book on them, and can collect the produced documents the VE may, if he wishes, treat it as an official check.

24.14 Activity Codes

- **MOTMS** - vehicle submitted for test to assess standard of testing at VTS. **Note:** Where two people carry out this activity it is important that one records the activity as 'continued' in order that the number of checks is not duplicated.
- **MOTMSD 1** Mystery Shopper with Induced Defects: To be used when submitting a vehicle for test (without VTS knowledge) to assess procedure and or standards being applied.
- **MOTMSD 2** To be used by the assisting Vehicle Examiner when supporting the first officer in carrying out the MSD 1 activity.
- **MOTSVP** Mystery Shopper with Induced Defects Vehicle preparation. This code should be used for preparing the vehicle for mystery shopper and restoring it to its service condition.
- **MOTMSA** Aborted Mystery Shopper check.

24.15 References

The MOT Testing Guide

- [Appendix 8.2 – Incorrect Test Standards](#)

- [Appendix 8.3 – Incorrect Test Methods](#)
- [Appendix 8.4C – Appointments and Viewing Tests](#)
- [Appendix 8.5 - Credits](#)