



MANITOBA  
PUBLIC INSURANCE

# Verifying Permit Holder Compliance

## Driver Training Permits

Driver Training Permit Unit  
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## Introduction

Manitoba Public Insurance (MPI) is responsible for issuing driver training permits and ensuring that permit holders comply with the legislative and administrative requirements that govern training providers. Under The Drivers and Vehicles Act, a permit is required to:

- Operate a driver training school;
- Instruct another person in driving a vehicle for compensation; and
- Use a vehicle for the purposes of driver training

MPI is committed to supporting providers in establishing practices that are compliant. The associated engagement, investigation, and verification activities help promote road safety in Manitoba by supporting driver training providers in meeting these requirements and ensuring that participating students receive the necessary training to operate motor vehicles safely and proficiently.

### Context

This document is intended to serve as a guide to inform permit holders of the practices used in monitoring, and of the potential consequences of non-compliance.

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## Contents

Understanding Requirements .....	3
<i>Contraventions</i> .....	3
Compliance Verification .....	4
<i>Comprehensive Compliance Audits</i> .....	4
<i>Partial Compliance Audits</i> .....	5
<i>Investigation of Complaints</i> .....	5
Responding to Non-Compliance .....	6
<i>Progressive Discipline Structure</i> .....	6
<i>Disciplinary Measures</i> .....	7
<i>Risk Level</i> .....	7
<i>Application of Sanctions</i> .....	8

## Understanding Requirements

Training providers must act in accordance with laws, regulation, and policy.

MPI will develop, refine, and distribute guidance material to continuously improve the accessibility of information regarding regulations and policies for driver training providers in Manitoba. This information can be found online at [Becoming a Driving School](#) and [Becoming a Driver Instructor](#).

We encourage permit holders to contact us if further guidance on, or interpretation of, these obligations is needed.

### Contraventions

To support transparency and ensure that permit holders are aware of the consequences of non-compliance, the severity of specific contraventions are defined in documentation available at the links above.

The severity is determined by the potential impact, as defined below.

Severity Level	Description
Minor	Actions reflect potential deficiencies in administrative practices that may have an adverse effect on students, stakeholders or the public. The risk to public safety is minimal provided the deficiencies are corrected.
Moderate	Actions pose some risk to public safety and may undermine the integrity of driver training unless corrected.
Major	Actions pose definite risk to public safety, or to the integrity of driver training and/or testing. Immediate corrective action is needed.
Critical	Actions pose extreme risk to public safety, degrade the integrity of driver training or testing, and/or make the permit holder ineligible to continue holding a permit. May result in immediate revocation of the permit.

While every effort has been made to provide information on legislative and administrative obligations, MPI may impose sanctions for any action that:

- Creates risk for students, potential students, or the general public; and/or
- Devalues driver training; and/or
- Compromises driver testing.

## Compliance Verification

MPI undertakes various measures to support compliance among driver training schools and instructors. These measures include:

- Communications and publications on the Manitoba Public Insurance website
- Providing information to driver training schools and instructors to assist them in understanding and meeting their obligations under the Act
- Monitoring driving schools, instructors and vehicles for compliance

All Permit Holders must adhere to permitting requirements. This includes Driver Training Schools, Driving Instructors, and the holders of Training Vehicle permits. All permit holders are subject to inspection and enforcement activities, including disciplinary actions for failure to comply.

MPI conducts periodic compliance audits to verify that schools and instructors are adhering to the requirements under The Act and regulation. Permit holders are required to supply the necessary records and information, allow access to facilities and equipment, make vehicles available for inspection, and provide all reasonable assistance to assist with the inspection. MPI personnel may also opt to interview students, instructors, and/or driving school staff as required.

Audit activities include both comprehensive audits and partial audits. Comprehensive audits include a full review of all relevant requirements, while partial audits focus on one or two selected aspects.

The frequency and scope of compliance audits is based on the Risk Level of the permit holder. While all permit holders are initially considered Level 1, multiple violations or a history of failing to take prompt action to address compliance issues will result in an increased Risk Level.

Risk Level	Frequency	Scope
Risk Level 1	Annually	Comprehensive
Risk Level 2	Bi-annually	Comprehensive
Risk Level 3	Quarterly	Partial
Risk Level 4+	Monthly	Partial

### Comprehensive Compliance Audits

Permit holders will be advised, in advance, of the proposed date and expectations for a comprehensive compliance audit. The comprehensive audit includes review of:

- MPI internal records to verify permit status, student qualifications, adherence to policies, and information related to licensing and registration.
- Facilities and equipment including designated training spaces (classrooms and yards/lots), training vehicles, and other training equipment.
- School records including student records, course records, instructor records and vehicle records.
- Delivery of driver training in the classroom, in the vehicle, and/or in a yard or lot.

Upon completion of the audit, MPI personnel will review the preliminary findings with the permit holder. A detailed report, including any noted non-compliance, will be provided to the permit holder following the audit.

If corrective action is required, MPI will notify the permit holder and may schedule follow-up visits or activities to verify that the required actions have been completed. For such activities, staff will generally contact permit holders ahead of time to arrange a mutually convenient time. However, unannounced visits may also occur.

## Partial Compliance Audits

Partial audits will be conducted regularly for permit holders with heightened Risk Levels (3 or higher). Partial audits may also be mandated to follow-up on previous corrective actions or to resolve concerns in particular areas.

Partial audits typically focus on one aspect of compliance. For example, one partial audit may be conducted to review student records, while another might focus on vehicle requirements.

Partial audits will be scheduled in advance, whenever reasonable. In some circumstances, advance notice may not be appropriate for assessing compliance. In these situations, no notice will be provided.

## Investigation of Complaints

MPI documents and investigates complaints alleging non-compliance by driving schools, instructors and their vehicles. Complaints may come from a variety of sources, including the general public, MPI service centers or other driving instructors or training schools. All complaints are assessed to determine the need for further investigation.

Investigatory actions, conducted in response to complaints or identified concerns, may be urgent in nature. Although MPI will provide advance notice when the circumstances allow, unannounced visits may also occur.

Investigations may consist of any or all of the following, along with any additional steps deemed necessary to reasonably conduct the evaluation.

- Inspection of training vehicles and related records
- Inspection of any premises used to provide driver training or operate a driving school
- Review of permit holder records (record reviews may be done at the provider's location or MPI may request copies to review off-site)
- Observation of driving instruction, including in-vehicle instruction
- Interviews with current or former students and instructors

## Responding to Non-Compliance

When a contravention is discovered, the disciplinary response is informed by the severity of the contravention and the permit holder's history. Permit holders include Driver Training Schools, Driving Instructors and the holders of Training Vehicle Permits.

MPI utilizes a progressive discipline structure to manage contraventions. In general, the first response is geared toward informing permit holders of the requirement to ensure understanding and allow for correction. Repeated contraventions will result in increasingly formal consequences.

### Progressive Discipline Structure

The Progressive Discipline Structure includes five steps that are designed to assist permit holders in correcting non-compliance. Preliminary steps do not apply to more severe contraventions. MPI may explore alternative actions where specific circumstances, such as mitigating or aggravating factors, warrant.

- 1. Verbal consultation:** for minor contraventions, MPI may initially discuss the matter with the permit holder to clarify the requirements and provide any supporting material required to ensure understanding and prevent further non-compliance.
- 2. Verbal warning:** for minor and moderate contraventions, MPI may issue a verbal warning to inform the permit holder of the contravention and determine appropriate actions to reduce the potential for future non-compliance.
- 3. Written warning:** this formal action will include written notice of the contravention, and provide the permit holder the opportunity to take the required corrective action.
- 4. Corrective Action Plan (CAP) or second warning:** depending on the nature of the contravention, MPI may work with the permit holder to establish a CAP to ensure processes are developed and implemented to mitigate the risk of future non-compliance. In circumstances where a CAP is not applicable, a second warning will be issued.
- 5. Final notice:** if non-compliance continues despite the previous opportunities to address the concern, MPI will issue a final notice to advise the permit holder that future violations will result in the revocation of the permit.

If all attempts to correct the non-compliance fail to rectify the behaviour, the permit may be revoked. Revocation may be temporary, such as a suspension, or permanent. Permit holders may be able to re-apply at such time that they can demonstrate that the material circumstances have changed.

## Disciplinary Measures

The specific disciplinary measure will be based on the severity of the offense, the history of non-compliance, and the Risk Level ascribed to the permit holder. Depending on the specific circumstances, a contravention may result in sanctions to multiple permit holders including the Driver Training School, Driving Instructor(s) and/or the holder of a Training Vehicle Permit.

The starting stage for any intervention is generally based on the permit holder's Risk Level (see below). Continued non-compliance of the same requirement will result in escalating measures intended to correct the issue and mitigate the risk of future non-compliance. MPI may impose alternate sanctions where circumstances warrant.

History	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5	Revocation of permit (suspension or cancellation)
Occurrence/recurrence of <b>Minor contravention</b> within 2 years	Verbal consultation	Verbal warning	Written warning	CAP or second warning	Final notice	
Occurrence/recurrence of <b>Moderate contravention</b> within 3 years	Verbal warning	Written warning	CAP or second warning	Final notice	→	
Occurrence/recurrence of <b>Major contravention</b> within 4 years	Written warning	CAP or second warning	Final notice	→		
<b>Critical contravention</b>	→					

## Risk Level

The assigned Risk Level will be used to determine the starting stage for disciplinary measures taken in response to any violations. For example, permit holders at Risk Level 2 will generally be subject to Stage 2 interventions for the initial occurrence of any future contraventions.

At minimum, any of the following occurring within a two-year period may result in an increased Risk Level:

- Contraventions of five separate requirements
- Issuance of three written warnings
- Issuance of any final warning

Each subsequent offence may also result in an additional increase in the permit holder's Risk Level.

## Preventive Action Plans

Permit holders who are subject to an increase in their Risk Level may also be required to complete a Preventive Action Plan. This action plan allows the permit holder to identify the steps they will take to ensure understanding of, and adherence to, all requirements. MPI will work with the permit holder to address any questions, review proposed actions, and develop reasonable objectives and timelines for implementation and follow-up.

## Application of Sanctions

If potential non-compliance is discovered or reported, MPI will review the matter and may conduct an investigation to determine if a sanction is warranted. All decisions regarding disciplinary actions are then subject to an internal review at Manitoba Public Insurance to ensure fair and consistent application.

Permit holders will be notified of any sanctions upon completion of the internal review. Upon receipt of the formal notice, permit holders may contact the Permit Unit if they have additional information that merits consideration.

If it is determined that the non-compliance, or history of non-compliance, warrants that a permit be suspended, cancelled, or revoked, the permit holder will receive written notice. The notice will include the date the permit suspension, cancellation, or revocation is effective along with a timeline for submitting a request for a hearing to review the matter.

In the event that a permit is refused, suspended, cancelled, or revoked, permit holders may opt to appeal the decision through the License Suspension Appeal Board.

MPI will maintain internal records of all sanctions imposed on training permits. Sanctions may also be made public, at the discretion of the registrar.



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