

## Response ID ANON-ZHKR-FJBF-Q

Submitted to **Graduated Driver Licensing**

Submitted on **2018-01-17 17:37:43**

### Permanent Secretary's Foreword

### Graduated Driver Licensing

#### Exemptions from the Mandatory Minimum Learning Period

##### Proposal: Carers

**1 Do you think that individuals entitled to claim Carer's allowance should be allowed an exemption from the mandatory minimum learning period?**

No

##### Proposal: Members of the Armed Forces

**2 Do you think that members of the Armed Forces should be allowed an exemption from the mandatory minimum learning period?**

No

**3 Are there any other groups you believe should be exempt from the mandatory minimum learning period, and if so why?**

**Please specify::**

No.

Brake supports a 12-month mandatory minimum learning period for all learner drivers. This will ensure that they gain the skills and experience necessary to control their vehicle at all times, without putting themselves or other road users at risk, under full supervision. We also recommend that all learner drivers receive a minimum of 10 hours of professional driving tuition in a car with dual controls. No groups or drivers should be exempt from completing the mandatory minimum period of training.

#### Exemption from completing a logbook

**4 Do you think that a driver who had their licence revoked or has been disqualified until retest should be allowed an exemption from having to complete the logbook?**

No

#### Motorway Driving

**5 Do you think that a learner driver (category B) should only be permitted on a motorway when accompanied by an Approved Driving Instructor?**

Yes

#### Motorway Riding

**6 Do you think that a learner rider should only be permitted on a motorway when accompanied by an Approved Motorcycle Instructor?**

Yes

**7 Are there any other restrictions or conditions you believe should be applied to learners (cars or motorcycles) on motorways?**

Yes

**Please include any comments here::**

Brake does not support the proposal that learner drivers/riders should be permitted to drive/ride on the motorway. Instead, there should be a requirement for all newly qualified drivers/riders to take a further 10 hours of professional tuition, during which they must learn to drive safely on motorways and at night. Novice drivers should then be required to pass a second driving test at the end of the two year period to help ensure safe driving on all types of roads. We do note, however, that questions 5 and 6 of this consultation do not provide scope for such a view and therefore, in a binary choice between allowing learners on the motorway with instructors or without, with is the most preferable option.

#### Transitional Arrangements

**8 Do you think that during the transitional period learners who are still subject to a 45mph speed restriction should be permitted to drive on motorways?**

No

## **New plating arrangements**

### **Proposal: Two part post test plate**

**9 Do you think that the post test plate should be divided into two parts?**

No

### **Proposal: Post-test plate colours**

**10 Do you think the letter R should be retained?**

Yes

**11 Do you think the new plates should be presented in the colours of blue and white?**

Yes

#### **Please include any comments here::**

Within the confines of this consultation, Brake believes that the same restrictions should apply for the full two-year period post-test. However, further, to this, Brake recommends that the following measures should be introduced as part of any package of GDL reforms, with restrictions for all novice drivers during the two-year period after they pass their practical driving test:

- Novice drivers should be allowed to drive unsupervised, but with certain restrictions on their driving, including:
  - o Novice drivers should not carry passengers who are younger than 25 unless supervised. Novice drivers who are parents or carers and need to carry children should be exempt from this restriction.
  - o Novice drivers should not drive between 11pm and 6am, unless supervised or travelling directly from home to work or school.
  - o Novice drivers should have a zero tolerance drink drive limit of 20mg of alcohol per 100ml blood (Brake recommends this for all drivers).
  - o Novice drivers should not drive on motorways.
- Novice drivers should be restricted in the size of engine they can drive.
- Any driving offences, or failure to comply with the restrictions during this period, should result in automatic disqualification.
- Novice drivers should be required to take a further 10 hours of professional tuition, during which they must drive on motorways and at night.
- Novice drivers should be required to pass a second driving test at the end of the two year period to help ensure safe driving on all types of roads.

## **Exemption from the Passenger Restriction**

**12 Do you think that drivers of the vehicles that are restricted to a maximum speed of 45mph or less as set out in Schedule 1 of the Motor Vehicles (Speed Limits) Regulations (Northern Ireland) 1989, should be exempt from the passenger restriction?**

No

## **Programme of training**

### **Programme of training Section 1 – Introduction**

**13 Do you think the topics proposed for inclusion in the introduction cover all required areas?**

No

#### **Please include any comments here::**

The topics proposed for the introduction deliver a broad overview of key driving skills but should put greater emphasis on road safety/safe driving practices, which should be first and foremost in any driver's mind before they get behind the wheel. Through Brake's work supporting victims of road crashes, we have witnessed the devastation that can result from dangerous driving behaviour, and learner drivers should be made aware of the enormous impact of bereavements or suffering a life-changing injury in a crash. We recommend that the introduction should emphasise the importance of keeping all road users (drivers, riders, cyclists, pedestrians and other vulnerable road users) as safe as possible and that learner drivers/riders should be educated about road risk from the very start of the training process [1]. Additionally, in light of the current obesity crisis and the need to reduce air pollution, including pollution caused by traffic, Brake recommends that the Introduction should include some guidance to encourage sustainable and active travel, and to remind would-be drivers and riders to consider making journeys by foot, bike or public transport whenever possible. References [1] Inspire, inform, engage: Developing a pragmatic approach to road safety and sustainable transport education interventions, Brake, 2017

### **Programme of training Section 2 – Skills for Life**

**14 Do you think there is a need to address behaviours and attitudes within the Programme?**

Yes

**15 Do you think the educational topics proposed for inclusion in the Skills for Life Section cover all required areas?**

Yes

**Please include any comments here::**

The topics proposed for the 'Skills for Life' section are insightful, far-reaching and particularly relevant to road safety. Each topic has important safety implications and promotes a positive and self-aware approach to driving. 'Goals for driver education' (GDE) recognises how driver attitudes influence real-world driving performance and aims to encourage positive attitudes towards the driving task [1]. It is difficult to assess driver behaviour on a measurable scale, but studies suggest that drivers with aggressive personalities are more likely to engage in more aggressive driving behaviour (e.g. tail-gating, risky overtaking, intimidating other drivers or breaking road traffic laws) [2]. 'Continuous learning' highlights the need for drivers to improve their skills over time, even after passing their test, while the 'self-evaluation and reflection' topic encourages driver-awareness and the need for drivers to adapt their behaviour where possible to reduce their risk of being involved in a crash. This includes the need to develop effective coping strategies to deal with difficult and stressful situations [3]. References [1] Beirness, D.J. Do we really drive as we live? The role of personality factors in road crashes, Alcohol, Drugs & Driving 9(3-4), 129-143, 1993 [2] Sarma, K.M. Psychological factors associated with indices of risky, reckless and cautious driving in a national sample of drivers in the Republic of Ireland, Accident Analysis Prevention 50, 1226-35, 2013 [3] Prevalence of Self-Reported Aggressive Driving Behaviour: United States 2014; AAA Foundation, 2016

### **Programme of training Section 3 – Knowledge and Practical training**

#### **16 Do you think the list of Modules for Drivers and Riders covers all required areas?**

No

**Please include any comments here::**

The modules listed for drivers and riders address a wide-range of important skills and knowledge that can help people remain safe on the roads; however, there are additional topics that should be included [1][2]. Brake recommends additional modules for motorcycle riders, to ensure they attain the same standards as drivers in terms of knowledge and skills. Motorcyclists in Northern Ireland had the highest rate of road deaths and serious injuries by mode travelled per 100 million kilometres in 2016 (219), a 13% increase on the 2012 baseline [5]. These vulnerable road users need to be given every opportunity to keep themselves safe on the roads. The Programme for motorcyclists should, therefore, include modules for 'the vehicle', 'the law', 'controls and checks' and 'manoeuvring'. A module on 'vehicle maintenance' is vital for both drivers and riders [6], to ensure they know how to carry out basic checks to keep their vehicle roadworthy and well-maintained. If safety critical parts such as brakes and wheels are not kept in good repair, this could cause the driver to lose control or fail to respond in time in an emergency, with potentially fatal results. An additional module on 'route planning and navigation (including sat nav technology)' would help learner drivers/riders to understand the importance of planning journeys to follow the safest route possible and scheduling enough time to complete their journey (whilst Brake does not support the usage of sat nav devices for motorcycle riding, as it is currently permitted, competence in its usage should be required and tested). Drivers/riders should be made aware that safety comes first and that they should never endanger themselves or others by speeding to reach their destination. They should also be taught to programme and install sat navs before starting their journey and never to adjust the equipment while driving/riding. (See response to question 42 and 43 for further comments on use of sat nav technology.) As outlined in our response to question 7, we believe that learner drivers/riders should not be permitted to drive/ride on the motorway. Instead, there should be a requirement for all newly qualified drivers/riders to take a further 10 hours of professional tuition, during which they must learn to drive safely on motorways and at night. Novice drivers should then be required to pass a second driving test at the end of the two year period to help ensure safe driving on all types of roads. We are pleased to see that the list of modules includes 'Ecosafe driving and the environment'. As the consultation highlights (page 41), many eco-safe driving techniques are also recognisably safe driving techniques, and the United Nations' Sustainable Development Goals (2030) identify 'ambient air pollution', including pollution from traffic, as the 'greatest environmental health risk' [3]. Governments have a responsibility to address poor air quality and promote safer and greener roads, and drivers and riders should be encouraged to drive efficiently, with care for the environment [4]. References [1] Reducing casualties involving young drivers and riders in Europe, European Transport Safety Council, 2016 [2] Global status report on road safety 2015, WHO, 2016 [3] Sustainable Development Goals 2030: Goal 3, United Nations, 2015 [4] Mobilising Sustainable Transport for Development: Analysis and policy recommendations from the United Nations Secretary-General's high-level advisory group on sustainable transport, United Nations, 2016 [5] Northern Ireland road safety strategy to 2020: Annual Statistical Report 2017, NISRA, 2017 [6] Realising the motorcycling opportunity: A motorcycle safety and transport policy framework together a safer future, MCIA & NPCC, 3rd edition, 2016

#### **17 Do you think that a modular approach is suitable for the knowledge and practical training section?**

Yes

### **Skills for Life elements in this section**

#### **18 Do you think that behaviours and attitudes should be addressed within each module?**

Yes

#### **19 Do you think that scenarios based on potential situations learner drivers may encounter should be included within each module?**

Yes (go to Question 20)

#### **20 Do you think that worksheets linked to the scenarios should have to be completed in each module?**

Yes

#### **21 Do you think the Programme should be available in hard copy, online or both?**

Both hardcopy and online

**Please give your reasons why you have chosen this option::**

The Programme should be made available as hard copy or online to ensure that it is easily accessible to all users, including those with limited access to the

Internet.

**22 If the Programme is made available in hardcopy, do you think A5 would be the appropriate size?**

Not Answered

**Please include any comments here::**

No comment

**23 If the Programme is made available online, what format(s) do you think would be most useful?**

Other

**If you have chosen 'Other', please specify::**

The training programme should be made available across multiple platforms to ensure it is easily accessible by everyone. We also recommend that hard copies are made available on request, for those who do not have regular Internet access.

## **Programme of training Section 4 - Logbook**

### **Validity of the Logbook**

**24 Once the Logbook has been completed and verified, do you think the Department should set a time limit by which the learner must have received their full driving licence?**

Yes

**25 Once the logbook has been completed and verified, do you think a 2 year validity period is appropriate?**

Yes

**Please include any comments here::**

**26 Do you think that the Department should set a validity period for each individual module?**

Yes

### **Content of the Logbook**

#### **Logbook Records**

**27 Do you think that the logbook should record the additional information proposed (learner record, ADI/AMI/SD/SR record and details of training event)?**

Yes

**28 Do you think the logbook should record any other additional information?**

Yes

**Please include any comments here::**

We would recommend that the Record of Training/Practice includes additional columns to record details about manoeuvres carried out, volume of traffic, near-misses or other notable incidents and time spent at the wheel. Separate columns for strengths and weaknesses would be useful to help identify risk areas and target additional training/practice that the learner needs. Although Brake does not support learner drivers taking lessons on the motorway (see response to question 7), if they are permitted to do so, this needs to be included in the record of training practice. A 'Type of road' heading (with subheadings Urban, Rural and Motorway) would be less open to misinterpretation than the current town/country headings.

**29 Do you think the logbook should be available in hard copy, online or both?**

Both hardcopy and online

**Please include any comments here::**

A hard copy or mobile app would enable the logbook to be completed by the instructor or supervising driver during the training/practice period or immediately afterwards, while the event is fresh in their mind. This will help to ensure that the detail recorded is complete and accurate.

### **Cost of the Programme and Logbook**

**30 It is estimated there will be an extra charge of £10-£15 for the Programme and Logbook. Do you think this cost is reasonable?**

Yes - £10-£15 is reasonable

**Please include any comments here::**

In relation to the costs associated with learning to drive, a £10 to £15 charge for the logbook seems reasonable.

**Proposed changes to the driving test**

**Consider extending the hours during which driving tests can be conducted**

**31 Do you think that the hours in which driving tests can be conducted should be extended?**

Yes

**32 If the hours of testing are extended, do you think that artificial light could be used for the eyesight test to facilitate night time driving tests?**

Yes

**33 Do you think that people would make use of the option to take their driving test later in the evening?**

Yes

**Developing the, 'show me', and, 'tell me', element of the practical test (technical questions)**

**34 Do you think that the 'show me, tell me' questions should be split to further assess learners' understanding?**

Yes

**35 If the 'show me, tell me' questions are split, do you think the 'show me' question should be asked while the vehicle is moving?**

Yes

**36 If the 'show me, tell me' questions are split, do you think the 'tell me' questions should include a sub question which would test understanding?**

Yes

**New criteria for developing driving test routes based on key causation factors of collisions**

**37 Do you think that driving test routes should take account of the main reason for traffic collisions (i.e. make them part of the criteria for developing driving test routes)?**

Yes

**38 Do you think that all test routes should be of a similar design to each other and always include the same content?**

No

**39 Do you think that all test routes should be designed differently to each other so they contain different content?**

Yes

**Include eco-safe driving as a possible reason for failing the car driving test**

**40 Do you think that driving in a non-eco-safe way should be included in the car driving test as a possible reason for failure?**

Yes

**Increase the duration of the independent driving section, including the use of sat nav**

**41 Do you think that the independent section of the driving test should be increased to 20 minutes?**

Yes - 20 minutes is about right

**Please include any comments here::**

Brake supports the increase in the duration of the independent driving section of the practical test from 10 to 20 minutes. However, use of sat nav technology during this section of the driving test should not take precedence over other core driving skills assessed during the practical test.

**42 Do you think that sat navs should be used during the car driving test?**

Yes

**Please include any comments here::**

Sat nav technology is widely available and it is important that learner drivers are taught how to use devices safely, without putting themselves or other road users at risk, and can demonstrate these skills during the practical driving test. Driving requires the full attention of the driver. Anything that takes attention away from the road – through sight, sound, thought or physical action – is a distraction, and a moment's distraction can have fatal consequences [1]. Research indicates that the most common types of distraction are voluntary, non-driving-related distractions that originate from within the vehicle, including sat navs [2]. Use of sat nav technology within the practical driving test should not be at the expense of more traditional forms of navigation, however, and learner drivers should also be asked to demonstrate their ability to navigate following road signs, verbal instruction or other prompts. Learner drivers should be made aware that they shouldn't rely solely on sat nav technology as it doesn't always work, and doesn't always reflect real-world driving conditions, including one-way systems, road closures and roadworks. References [1] Lee, J., Dynamics of driver distraction: the process of engaging and disengaging, 2014 [2] Beanland, V., et al. Driver inattention and driver distraction in serious casualty crashes: data from the Australian National Crash In-depth Study, 2013

**43 Do you think that sat navs should be used during the motorcycle driving test once it becomes practical to do so?**

Yes

**Please include any comments here::**

As Brake does not support the usage of sat nav devices for motorcycle driving, it therefore follows that we do not believe that sat navs should be used in the motorcycle driving test. As outlined in our response to question 16, motorcyclists are particularly vulnerable to death and injury on the road [2]. In-vehicle technology can pose a significant distraction if it is used incorrectly, and we do not believe there is an appropriate situation to use a sat nav device when riding a motorcycle [1]. However, as sat navs are currently permitted to be used, we believe that there should also be a requirement to assess this in the test, thus ensuring full competence in all areas of motorcycle driving. References [1] Lee, J., Dynamics of driver distraction: the process of engaging and disengaging, 2014 [2] Realising the motorcycling opportunity: A motorcycle safety and transport policy framework together a safer future, MCIA & NPCC, 3rd edition, 2016

**44 Do you think that the Department should be allowed to temporarily fit a sat nav into the candidate's vehicle for the duration of the driving test?**

Yes

**Consider including an element of self-evaluation prior to and after the driving test, linked to the logbook.**

**45 Do you think that it would be beneficial to include a self-evaluation form in the logbook?**

Yes

**Please include any comments here::**

Brake supports the inclusion of a self-evaluation form in the logbook and agrees that this could help learner and novice drivers to identify areas of weakness and additional driver training/practice that they need to undertake. Self-evaluation will encourage learner and novice drivers to understand that adopting safe driving habits can help them protect themselves and other road users, and reduce their risk of being involved in a crash.

**46 Do you think that learner drivers and their trainers would use the self-evaluation forms if they were included in the logbook?**

No

**Please include any comments here::**

It is unlikely learner and novice drivers or their trainers would use the self-evaluation forms, unless this was made a compulsory part of the driving test.

**Additional Information**

**47 What age category do you fall into?**

**Age ranging between::**

25-34

**48 What identification category do you fall into? (Please tick all that apply)**

Group or Organisation

**49 If you have selected 'Other' or 'Group or Organisation' in Question 48, e.g. Driving Schools, Insurance Companies, Road Safety Organisations, Councils, please provide more information here:**

**Please specify::**

Group or Organisation

**Please provide details of the Group or Organisation::**

Brake - the road safety charity. Brake is an international road safety and sustainable transport charity, founded in 1995, that exists to stop the needless deaths and serious injuries that happen on roads every day, make streets and communities safer for everyone, and care for families bereaved and injured in road crashes. Brake promotes road safety awareness, safe and sustainable road use, and effective road safety policies. We do this through national campaigns, community education, services for road safety professionals and employers, and by coordinating the UK's flagship road safety event every November, Road Safety Week. Brake is a national, government-funded provider of support to families and individuals devastated by road death and serious injury, including

through a helpline and support packs.