

**THE ROYAL SOCIETY FOR THE PREVENTION OF ACCIDENTS
RoSPA**

RESPONSE

TO DFT, DSA, DVLA'S CONSULTATION PAPER

**DRIVER TESTING, TRAINING, EXAMINING AND LICENSING:
IMPLEMENTING NEW EUROPEAN UNION REQUIREMENTS**
(Directive 2006/126/EC – the third Directive on driving licences)

1 February 2010

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the consultation paper, "Driver Testing, Training, Examining and Licensing: Implementing New EU Requirements". RoSPA welcomes the invitation to comment, and our response has been prepared following consultation with RoSPA's National Road Safety Committee.

Background

UK rules on driver licensing and driving tests operate within the framework of the second European Directive on Driving Licences (Directive 91/439/EEC), which provides for mutual recognition of driving licences between member states of the European Union (EU) and the European Economic Area (EEA), and harmonisation of the licence categories and driving test standards.

The Third Directive on Driving Licences (Directive 2006/126/EC) was adopted at the end of 2006, and must be transposed into UK law by mid-January 2011 and come into practical effect by mid-January 2013.

The Third Directive further harmonises definitions of vehicle sub-categories and rules on the duration of the validity of a licence, introduces minimum standards for driving examiners and attempts to ensure that no one can simultaneously possess more than one licence issued by an EU or EEA state.

Most of the provisions of the new Directive are consistent with current UK practice or with measures the government already intend to take. But some provisions, especially the ones requiring formal testing or training for younger motorcyclists wishing to progress to larger and more powerful machines, require significant changes to UK rules. Several provisions give member states options on how they are implemented. For example, member states can reduce the minimum age for moped riders to 14, or have a minimum age of 18 for drivers of cars and light vans.

There are, however, some significant changes that the UK must implement:

- Change the size categories of motorcycles, including a new medium-sized category
- Increase the minimum age for motorcyclists gaining direct access to the most powerful motorbikes from 21 to 24 years
- Introduce a new formal test or a training programme for younger motorcyclists wishing to progress in stages to the larger and more powerful machines
- Require drivers of medium and large buses and lorries to renew their licences and demonstrate continuing medical fitness every five years
- Introduce a formal test or a training for car and light van drivers who wish to tow a medium-sized trailer

While driving entitlements obtained before 19 January 2013 will not be affected by the new Directive, other changes, in particular licence validity periods and mandatory medical assessments, will apply to existing licence-holders who require a new licence on or after 19 January 2013.

This consultation deals with Great Britain only. The Driver and Vehicle Agency (DVANI) in Northern Ireland will issue a separate consultation.

MOPEDS, MOTORCYCLES, TRICYCLES AND QUADRICYCLES

Mopeds (category AM)

The Directive defines a moped as:

a 2-wheeled vehicle with a maximum design speed over 25km/h (15.5 mph) but not more than 45km/h (28 mph); or

a 3-wheeled vehicle with a maximum design speed over 25km/h (15.5 mph) but not more than 45km/h (28 mph) – and up to 50cc and below 4kW or

a light quadricycle - unladen mass under 350 kg and up to 45km/h (28 mph).

The Directive sets a minimum driving age for category AM of 16 years, and a minimum standard for a test of competence to ride a moped, which involves passing a theory test only. However, member states may require applicants to pass a practical riding test and meet medical standard. Member states may also introduce a domestic category of light tricycles and quadricycles within category AM and impose a practical riding test for those vehicles. They may lower the minimum age for a rider in this category to 14 or raise it to 18 years.

The GB government proposes to maintain Britain's existing minimum age of 16 years and the requirements to complete a CBT course to validate the provisional licence and to allow the learner to train on the road; and to pass a test (a theory test and a two-part practical test) before obtaining a full moped licence.

UK driver licensing arrangements include all mopeds with a design speed up to 45 km/h (28 mph) and do not distinguish between those with a design speed under or over 25 km/h (15.5 mph). Therefore, a new category will be introduced for mopeds with a design speed of up to 25 km/h alongside the new EU category AM covering those between 25km/h and 45km/h. The qualification process for this category will be the same as that for category AM.

Learners seeking a full category AM licence will be able to take their practical test using any two-wheel vehicle within the AM category, akin to our current minimum test vehicle (MTV) standards for a practical moped test.

The government sees no significant road safety advantages in introducing a domestic sub-category with its own test for light tricycles and quadricycles because those who pass their test using a two-wheel moped gain full entitlement to ride such machines.

Question 1: Do you agree with our proposals for moped licensing?

RoSPA Response

RoSPA believes that the UK's current minimum age of 16 years for riding a moped must be retained. It is also absolutely essential that the UK's current requirement that moped riders must pass CBT, a theory test and the two-part practical test be retained. The UK should refuse to recognise the validity of a driving licence for mopeds issued by another member State where the rider is under 16 years of age.

The Directive requires the new sub category for light tricycles and quadricycles be introduced and RoSPA agrees that the test requirements for users of these vehicles should be the same as for mopeds, and that people who pass the full moped test should gain entitlement to ride light tricycles and quadricycles. However, those who pass their test on a light tricycle or a quadricycle should not gain entitlement to ride a two-wheeled moped.

Provision for Moped Riders with a Physical Disability

Riders with a physical disability that limits their use of moped to a machine with three or four wheels should be allowed to take their test using a vehicle that comes within the new EU category AM. The full licence issued would not entitle the holder to ride a two-wheel moped, but denote the restricted entitlement granted. This would apply only within the UK.

Question 2

Do you agree with our proposals for special provision for moped riders with a physical disability?

RoSPA Response

RoSPA believes this is a fair and sensible approach.

New Categories of Motorcycles: A1, A2 and A

The Directive requires members states to change the size categories of motorcycles, set minimum ages for each category and require staged, progressive access to more powerful machines. Direct access to larger machines is allowed for riders who meet minimum age requirements and pass a test or take approved training. Member States must impose a two-year period between the minimum age for categories A1 and A2, and between A2 and A.

Category A1

Motorcycles up to 125cc/11kW with a power/weight ratio not exceeding 0.1 kW/kg (including motor tricycles up to 15kW). The minimum age in Britain will be 17 years. Riders must pass a theory and practical test.

Category A2

Motorcycles up to 35kW with a power/weight ratio not exceeding 0.2kW/kg and not derived from a vehicle of more than double its power. The minimum age in Britain will be 19 years.

Progressive Access

Those who have held a full A1 licence for at least 2 years, and are at least 19 years old, can gain a full A2 licence by passing a practical test or approved training on an A2 machine.

Accelerated Access

Those who have held an A1 licence for less than 2 years can gain a full A2 licence, provided they are at least 19 years old, and pass the relevant theory and practical tests.

Direct Access.

Those who have not held an A1 licence can gain a full A2 licence, provided they are at least 19 years old, by passing the relevant theory and practical tests.

Category A

Unrestricted motorcycles above 35kW (including tricycles over 15kW). The minimum age in Britain will be 21 years, or 24 years if Direct Access.

Progressive Access

Those who have held a full A2 licence for a minimum of 2 years, and are at least 21 years old, can gain a full A licence by passing a practical test or approved training on an A machine.

Direct Access

Those who have not held an A2 licence can gain a full A licence, provided they are at least 24 years old, by passing the relevant theory and practical test on a motorcycle of at least 600cc and 40kW power output.

Approved Training

The UK normally requires riders to pass a suitable test in order to gain full licences. However, the Third Directive allows member states to provide licence entitlement by completing an approved training course, of at least 7 hours duration using a suitably sized motorcycle. Such a training course would need to:

- *be competence-based, providing riders with the knowledge and skills to handle a more powerful motorcycle*
- *be delivered in modular format with particular emphasis on the various key differences such as machine type, handling characteristics and additional safety features*
- *last a minimum seven hours, and if organised in smaller units, each session would be at least two hours*
- *include an initial assessment of a trainee's skill level to enable the instructor to tailor a course to their needs*
- *be successfully completed within six months*
- *provide an auditable record that the trainee has demonstrated each element of competence.*

The government does not wish to allow licence entitlement by completing a course (rather than passing a test) but believes that familiarisation training for each licence category could offer safety benefits, and provide a simple and user-friendly way of granting provisional entitlement at different levels. A two-year validity to certificates would encourage trainees to become fully qualified within that time and not remain permanent learners.

Question 3

Do you consider that a training route should be offered to allow motorcycle licence upgrades?

Question 4

If you believe that wider considerations support a training route for progressive access, do you agree with our proposals for the standards and registration arrangements that should be operated for that training and those delivering it?

Question 5

Do you agree with our proposals for a familiarisation training course within progressive access arrangements?

RoSPA Response

RoSPA supports the approach of setting minimum ages and requiring riders to gain experience first on a less powerful machine, and then demonstrating their competence on larger machines by passing appropriate theory and practical tests. However, it is not clear from the proposals what each test would comprise and how they would differ from each other. The proposals would require a rider taking the progressive access route through A1 to A2 to A to take three separate tests, but it is not clear whether the tests will be tailored to the category of motorcycle to which they apply, or whether they will be virtually identical, except on different machines.

It is important that motorcyclists regard the tests as a genuine and useful mechanism to help prepare them for riding larger machines, rather than an expensive formality. Repetitive tests might actually discourage riders from taking progressive training, and opt instead for Direct Access, or in a worst case scenario, ride unlicensed.

The motorcycle training and testing regime should encourage progressive, tailored training appropriate to each category of motorcycle, and all tests should be clearly tailored to the category of motorcycle and the type of riding associated with each category.

RoSPA agrees that the UK should retain the minimum age of 17 years for light motorcycles and the requirements for riders to pass CBT, a theory test and a practical test. We also believe that riders who are young than 17 years and have gained a licence in another member state that sets a lower minimum age, should not be able to ride a motorcycle using that licence in the UK until they have reached 17 years of age.

RoSPA supports the proposal to set a minimum age of 19 years for riders of medium sized (category A2) motorcycles. We support the proposals for Progressive, Accelerated and Direct Access routes to gaining a full A2 licence.

RoSPA also supports the proposal to set a minimum age of 21 years for riders of unrestricted (category A) motorcycles, and the minimum age of 24 years for those gaining a full A licence through the Direct Access route. We support the proposals for Progressive, Accelerated and Direct Access routes to gaining a full A2 licence.

Training Route

RoSPA believes that the UK should retain the principle and practice of requiring riders to pass a suitable test in order to gain a motorcycle licence and/or to upgrade to a licence for larger machines, but as stated above the tests should be relevant to the categories and not just a repetition of an earlier test.

We also strongly believe that progressive training is essential and fits perfectly with the ethos of the UK's approach to driver licensing, testing and training. We support the proposal to develop familiarisation training. The training should meet a standard, minimum syllabus and trainers who deliver it should be certified and registered to ensure quality control and effectiveness. Trainers and courses should be approved and certified by the DSA.

The training available to motorcyclists and the take up of that training by motorcyclists needs to be improved. The training also needs to be affordable and accessible, and avoid creating dis-incentives to take training. Progressive access should be a genuine alternative to direct access.

The quality of any such training is clearly crucial. RoSPA has long recommended that there should be a statutory register of motorcyclist instructors (similar to the one for car driving instructors) to ensure instructors are trained, tested and monitored to minimum, national standards, and the development of training competencies and professional qualifications for motorcyclist trainers.

PROVISIONAL ENTITLEMENT AND TRAINING

EU law on driving licences does not regulate provisional driving licences. Provisional licences are not driving licences for the purposes of EU Directives and confer no entitlement to drive outside the UK. Therefore, the UK has some freedom to arrange provisional licence rules.

Moped (Category AM) Provisional Licensing

To ride a moped on the road a learner will have to:

- *obtain a provisional AM licence*
- *be at least 16 years old*
- *satisfactorily complete CBT to validate the provisional licence to ride on the road.*

They will then be able to ride unaccompanied any moped on L plates during the two year validity period of the training certificate.

Small motorcycle (Category A1) Provisional Licensing

To drive a category A1 motorcycle on the road a learner will have to:

- *obtain a provisional A1 licence*
- *be at least 17 years old*
- *satisfactorily complete CBT to validate the provisional licence to ride on the road.*

They will then be able to ride unaccompanied any A1 motorcycle on L plates during the two year validity period of the training course certificate. The initial training requirement will be waived for the A1 learner if they have previously qualified for a full moped licence.

Medium-sized motorcycle (Category A2) provisional licensing

A full category A1 licence also grants a provisional category A (including A2) licence, but the provisional entitlements will not become "live" until the person has held a full category A1 licence for a minimum of two years and then passed a suitable training course.

Direct Access

A provisional A2 licence can be obtained from the age of 19 years. The rider will need to complete initial training to ride on the road, and will then be able to ride any A2 machine on L plates during the two year validity period of the initial training certificate. They must satisfactorily complete the full syllabus before taking the practical test for an A2 licence.

Unrestricted motorcycle (Category A) provisional licensing

A person holding a full category A2 licence will have provisional category A entitlement to ride on the road when they have held a full A2 licence for a minimum two years and then passed a suitable training course.

Direct Access

The current Direct Access Scheme (DAS) arrangements will apply, subject to a higher minimum age of 24 years. A person will be eligible to apply for a provisional category A licence any time after they have reached the age of 24. The rider will need to complete initial training to ride on the road, and will then be able to drive any category A vehicle on L plates during the two year validity period of the initial training certificate. The learner must complete the direct access syllabus before taking the practical test for a category A licence.

In each category learners will not be allowed to ride on a motorway or in another EU State or carry a pillion passenger until qualified to hold a full licence for that category. If they do not qualify for a full licence within two years, they will have to take a refresher training course to re-validate the provisional licence for a further two years.

Question 6

Do you agree with our approach to provisional licensing for mopeds and motorcycle learners?

RoSPA Response

RoSPA supports these proposals. Provisional licence arrangements are an important part of the way people learn to ride. They enable people to learn and gain experience in a safe manner, and incentivise learners to gain full licences.

The licensing regime for motorcycles is already complex, and the changes required by the EC Directive seem likely to make it even more so. The government will need to devote sufficient resources to explain the rules, ensure that everyone understands them and to discourage 'permanent learner status'.

Physically Disabled Riders

The Third Directive allows a Member State, with the agreement of the EC, to make special provisions to meet the needs of physically disabled persons. Motorcycles and motor tricycles designed or adapted to accommodate a wheelchair are often heavier and more powerful than the motorcycles in categories A1 and A2. The government proposes to seek the agreement of the Commission to allow a minimum age of 17 years for physically disabled persons to ride suitably adapted tricycles or motorcycle sidecar combinations. Persons who obtain this restricted entitlement will be restricted to riding certain types of vehicles - i.e. a tricycle or a motorcycle and sidecar with adaptations. This would not be recognised in other member states until the rider had attained the minimum age for the category of tricycle/motorcycle.

Question 7

Do you agree with our proposals to make special provisions for motorcycle riders with a physical disability?

RoSPA Response

RoSPA believes this is a fair and sensible approach.

CATEGORY B1 (LIGHT CARS, TRICYCLES AND QUADRICYCLES)

Under current EU law, three-wheel motor vehicles and quadricycles form Category B1. However, under the new Directive, only full powered quadricycles would fall into category B1. Small tricycles and light quadricycles fall into category AM, light tricycles into category A1, and more powerful tricycles into category A. The new Directive sets the standard minimum age for driving vehicles in category B1 as 16 years, and requires a theory and practical test to be passed to qualify for a full category B1 licence.

Member states may choose whether to issue separate licences for category B1, or whether to require access to driving vehicles in category B1 to be by obtaining a category B licence.

In 1996, Britain introduced B1 as a separate driving licence category because at that time, vehicles that met the needs of physically disabled drivers were often lightweight three-wheel cars, and users did not want a full licence for a full-sized (category B) car. However, modern vehicles used by physically disabled people are four-wheel and sufficiently heavy that they fall into category B, rather than category B1. Therefore, the government does not intend to retain category B1 as a separate category. Drivers who already hold full B1, but not full B, entitlement will have their B1 driving entitlement preserved.

Question 8

Do you agree that we should cease to issue separate category B1 licences to new drivers?

RoSPA Response

RoSPA agrees that category B1 licences should not be issued to new drivers (but should be retained for existing holders of B1 licences), provided that there are no major objections from representatives of such drivers.

CARS AND LIGHT VANS TOWING TRAILERS

A category B licence automatically permits drivers to tow small trailers. However, the Third Directive amends the rules for towing trailers on cars and light vans, and sets new conditions for entitlement to tow medium sized trailers by introducing a new category (B96):

- *category B vehicles are allowed a maximum authorised mass (MAM) not exceeding 3,500kg and may be combined with a trailer having a MAM which does not exceed 750kg*
- *subject to type approval rules, category B vehicles may be combined with a trailer exceeding 750kg as long as the MAM of the combination does not exceed 3,500kg:*
- *category B vehicles may tow a trailer with a MAM exceeding 750kg provided the combined MAM of the vehicle + trailer does not exceed 4,250kg and the driver has qualified for B96 entitlement*
- *if the combined MAM of the motor vehicle in category B plus trailer exceeds 4,250kg then the driver needs category B+E entitlement*
- *an upper limit is placed on the combined weight of category B+E entitlement of 7,000kg MAM (category B vehicle up to 3,500kg plus a trailer up to 3,500kg)*
- *the minimum age for category B+E is 18 years, but member states may lower this to 17 years.*

Under the Directive, new drivers seeking B96 entitlement will have to demonstrate competence, and the Directive allows each member state to choose how this is done. The DSA does not propose to provide a test solely for category B96 entitlement as it would be indistinguishable from the test for a full category B+E licence. Therefore, the test for B96 entitlement will be the practical test for B+E entitlement.

Currently, training to drive B+E vehicle combinations is unregulated, and is often offered by providers who train drivers of lorries and lorry plus trailer combinations, as they have off-road training facilities.

A training course for obtaining B96 entitlement would need to:

- *be competence-based, focussing on providing drivers with the knowledge and skills to drive a car or light van towing a larger trailer;*
- *be at least seven hours long and if organised in smaller modules, each session would be a minimum of two hours*
- *include an auditable record to ensure the trainee had demonstrated each element of competence before moving onto the next*
- *have to be successfully completed within six months of commencement of the training programme.*

At the successful conclusion of the course, the trainer would certify that the trainee had demonstrated the necessary competences which will entitle them to upgrade their licence.

Raising the minimum driving age for category B+E to 18 years might affect the employment opportunities of young people seeking jobs that involve towing plant. We have no plans to make this change in GB. The minimum age for obtaining a provisional or full category B+E licence in GB will therefore remain at 17 years.

Question 9

Do you consider that a training route should be offered for entitlement to tow a medium-sized trailer with a car or light van?

Question 10

If you support a training route for entitlement to tow a medium-sized trailer do you agree with our proposals for the standards and registration arrangements that should be operated for that training?

RoSPA Response

RoSPA believes that the UK should retain the principle and practice of requiring drivers to pass a suitable test in order to gain the entitlement to tow trailers on a car or light van.

However, we also strongly believe that training is essential and we support the proposal to develop such training. It is surprising that the current provision of B + E training is unregulated, and RoSPA believes that this should be changed. Training for B + E and for the new B96 entitlements should meet a standard, minimum syllabus and trainers who deliver such courses should be certified and registered to ensure quality control and effectiveness. Trainers and courses should be approved and certified by the DSA.

It seems likely that most drivers who wish to gain the entitlement to tow trailers on their category B licence would wish to gain the full B + E entitlement which would enable them to drive a much larger range of trailer combinations than the more restricted B96 entitlement. Therefore, RoSPA agrees that the test for the B96 entitlement should be the B + E test.

RoSPA agrees that the UK's minimum age of 17 years for gaining entitlement to tow trailers on a category B licence should not be changed.

DRIVING EXAMINERS

The new Directive introduces European standards for the initial qualification, quality assurance and periodic training of examiners authorised to conduct practical tests for licence acquisition. These are broadly in accordance with UK existing practice. Examiners already working in that capacity before 19 January 2013 will not be subject to the requirements for initial qualification. The new Directive requires the competent authority (the DSA in GB) to ensure that these standards are met for all examiners conducting licence acquisition tests, whether they are employed by the competent authority or by other organisations.

The main provisions:

- *set a minimum age of 23 years for examiners*
- *require applicants to have held a category B licence for a minimum of 3 years*
- *require applicants to have completed a vocational education (i.e. completed their secondary school education)*
- *specify an initial qualification process for all examiners*
- *set additional standards for those conducting practical tests for licences to drive motorcycles, lorries and buses*
- *allow acquired rights for existing examiners in respect of the Directive's*
- *specify quality assurance arrangements to ensure they are supervised at work (minimum half a day every 5 years)*
- *specify periodic training requirements for all examiners to maintain and refresh examining skills (at least 4 days in two years), and to develop and maintain the necessary practical driving skills (at least 5 days in 5 years)*
- *prohibit an examiner from also being active in commercial driving instruction.*

The current DSA quality assurance scheme for delegated examiners (those employed by organisations other than the DSA) will be expanded to include the inspection of periodic training records. The DSA propose to require organisations that appoint examiners who conduct licence acquisition tests to ensure that their examiners receive the appropriate periodic training, maintain the relevant training records complete and readily available for inspection by DSA.

Question 11

Do you agree with our proposals to amend the conditions of approval for organisations with examiners as regards the maintenance of records of supervised tests and undertaking periodic training?

RoSPA Response

RoSPA agrees that organisations that employ delegated examiners who conduct licence acquisition tests should be required ensure their examiners are suitably trained and supervised and that proper records are maintained and open for inspection by the DSA. Of course, this system requires the DSA to put sufficient resources into conducting audits and inspections of such organisations and their examiners.

MANDATORY CHANGES TO THE ADMINISTRATIVE VALIDITY PERIODS OF PHOTOCARD LICENCES

Group 1: Drivers of Small Vehicles (2, 3 and 4 wheeled mopeds motorcycles, tricycles, quadricycles, cars and light vans)

The Current Rules

Licences for Group 1 drivers give an entitlement to drive up to the driver's 70th birthday, unless a short period licence is issued for medical reasons. However, the photocard licence has an administrative validity period of 10 years, after which drivers must apply for a replacement, submitting an up to date photograph. A new ten-year full photocard licence is then issued. This process continues until the driver reaches age 70, when s/he has to renew their driving entitlement. Thereafter, drivers must renew their licence every three years.

Where a driver with a provisional licence applies for a full licence on passing a driving test, the subsequent full photocard licence is valid for the remainder of the original ten years. Similarly, where a licence needs to be replaced (due to a change of address for example), the replacement licence is also valid for the remainder of the original 10 years.

New Rules

However, from 19 January 2013, licences issued must have an administrative validity period of ten years. So, for example, where a provisional licence is upgraded to a full licence the new photocard licence would need to be valid for ten years, from the date the full licence is granted, not ten years from the date of issue of the original provisional licence. The Directive offers an option to issue licences for up to 15 years and short period licences for medical reasons, for novice drivers or for drivers aged over 50.

There is also an option to require all drivers to undergo medical examinations before renewing their licences, but the UK government does not propose to require all drivers to undergo medical examinations when they renew their photocard licence every 10 years.

Group 2: Drivers of medium and large buses and lorries

Current Rules

Licensing requirements for this group of drivers are already more stringent than for drivers of Group 1 vehicles. They must submit a medical report with their provisional licence application, completed by a qualified medical practitioner, to show that they meet the required health standards. They have to renew their driving entitlement at age 45 and every five years after that until age 65, then annually. With each application to renew driving entitlement, they must produce up-to-date medical reports.

Photocard licences must be renewed every ten years. However, from the age of 45 years, Group 2 drivers also renew their entitlement to drive Group 2 vehicles every five years by providing medical evidence of their fitness to drive. Drivers with certain medical conditions may be issued licences for shorter periods so that their condition can be kept under review.

New Rules

Photocard driving licences issued from 19 January 2013 for group 2 drivers must have an administrative validity of five years only, from the date the driving entitlement is obtained. Administrative renewal of the photocard licence every five years will be subject to the driver's continuing compliance with the minimum standards for fitness to drive.

In Great Britain, this will affect drivers under the age of 45 years, and the government proposes to start issuing five-yearly photocard licences as soon as a person obtains the relevant entitlement to drive. However, five yearly medical checks would continue to apply only from the age of 45 years, not earlier.

Question 12

Do you agree with the approach being taken to implement the administrative provisions of the new Directive?

RoSPA Response

Medical Exams

RoSPA agrees that it would be too stringent to require Group 1 drivers to undergo a medical exam every time they renew their 10 year photocard licence. This would impose significant costs on drivers and substantial additional workload pressure on the medical profession without evidence that it would create significant road safety benefits. However, a consultation on the medical rules for fitness to drive by the DVLA was announced well over a year ago and has still not taken place.

RoSPA also agrees that the five yearly medical checks for Group 2 drivers should continue to apply from the age of 45 years, and not earlier. The consultation paper notes that health data show that there is no need to provide medical examinations before the age of 45. It is also essential that employers take responsibility for assessing, and monitoring the fitness of its drivers within their overall Managing Occupational Road Risk policies and procedures.

RoSPA is not clear whether these proposals would have specific implications for drivers and operators of minibuses that operate under a permit scheme, and suggest that the DSA should consider whether there are likely to be any adverse effects that would make the use of minibuses by voluntary organisations more difficult.

Novice Drivers

RoSPA does not support shorter licence periods for new drivers. Existing measures, and the proposed changes following the DSA's consultation 'Learning to Drive' are already designed to improve the safety of novice drivers. However, the idea of a short period licence for novice drivers would be reviewed whenever changes to driver licensing in the UK is considered.

RoSPA thanks the DfT, DSA and DVLA for the opportunity to comment on the proposals. We have no objection to the contents of our response being reproduced or attributed.

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