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# RoSPA Response to “Improving the Car Driving Test”

A Driver and Vehicle Standards Agency  
Consultation Paper

19 August 2016



Response to "Changes to the driving test" Consultation Paper

## Introduction

This is RoSPA's response to the Driver and Vehicle Standards Agency's consultation paper "Improving the Car Driving Test". It has been produced following consultation with RoSPA's National Road Safety Committee.

Young or novice drivers account for around 20% of road deaths, even though they comprise only 7% of full licence holders and drive less mileage than other drivers. Young drivers pose a serious risk to other road users, as well as to themselves. In 2014, 342 people were killed in road accidents involving young drivers, including 120 young drivers, 86 passengers of young drivers and 136 other road users.

This situation has remained broadly constant for many years despite a number of changes introduced over the last few decades that were designed to reduce young driver risk. These included the Theory and Hazard Perception Tests, extending the Practical Driving Test, a new learning to drive syllabus, New Drivers Act and Pass Plus. However, young drivers continue to face and create a high and disproportionate risk; one in five crash within their first six months of driving and they have a higher crash risk than other drivers, with their crashes more likely to be severe in nature, especially on rural roads.

The Government believes the risk involving young, novice drivers can be diminished by strengthening the training and testing of learner drivers, and in particular by ensuring that the practical driving test reflects modern driving.

### The independent driving section of the test

The test was last reviewed between 2008 and 2012 and one of the main measures subsequently introduced was the independent driving section in October 2010. This involves a candidate driving for ten minutes from one specified location to another, without direction from the examiner. Research has indicated that those who had recently passed their test were positive about this exercise with the majority saying that the training received in advance was valuable and relevant to driving undertaken after passing the test.

Therefore, the Government propose to increase the independent driving section of the practical driving test from 10 to 20 minutes to provide a greater opportunity for candidates to demonstrate their ability to drive without direction from an examiner. This will also encourage more preparation on driving independently during learner driver training before the test, and a more comprehensive assessment to be made of a candidate's ability to navigate realistic traffic conditions and drive safely from one location to another. This should, in turn, feed back into the standards exhibited on the road and thereby reduce casualties.

### Question 1

**Do you agree with the proposal to increase the independent driving section of the test from 10 to 20 minutes**

### RoSPA Response

Yes RoSPA strongly supports the proposal to increase the independent driving section of the test from 10 to 20 minutes. RoSPA viewed this change in action in a demonstration test and recognised the potential an additional 10 minutes could make in allowing candidates to drive in different road and traffic conditions. This proposal should allow candidates the opportunity to demonstrate that they can drive independently, which is exactly what they need to be able to do once they pass their test.



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Young drivers are most at risk immediately after passing their test and in their first year of driving. They will often have good car control skills and fast reactions but because of the lack of experience are poor at identifying hazards and assessing risk, and tend to overestimate their ability to avoid the accident. As new drivers gain more driving experience their accident rate begins to fall. Once a new driver has driven about 1,000 miles, they have an equivalent safety risk as a driver with 3 years experience.

Therefore, RoSPA supports and commends this measure which will help to prepare young drivers for the rigours of the road once they are no longer supervised. We expect that by increasing the prominence of the independent drive during the driving test, the training learner drivers receive to prepare them for the test will focus more on the skills required to drive independently.

### **Using Sat navs in the Independent Driving Section of the Test**

It is important for the content of the practical driving test to adapt to changes in technology and driving practises. The test needs to reflect the road and traffic conditions at the time it is conducted. There are, however, new in-car developments that are not automatically incorporated into the test. One of these developments has been using sat navs and other automated software to navigate directions, which are increasingly used in day to day driving. This change in driver behaviour should be reflected in the test.

Allowing sat navs to be used will also offer the potential to widen the geographical scope of test routes, including higher speed roads, because it will no longer be necessary to rely exclusively on road signs.

Therefore, the Government proposes to include the provision for directions to be followed from sat navs in the independent driving section of the test.

### **Question 2**

#### **Do you agree with the proposal to include the use of sat navs in the independent driving section?**

#### **RoSPA Response**

Yes, RoSPA agrees with this proposal.

The last few years have seen a rapid introduction in new vehicle technology designed to aid the driver. Many drivers, and young people are no exception, now rely heavily on satellite navigation devices and it makes practical sense to teach them to use and follow the directions provided in a safe fashion. In building their use into the test, ADIs will be encouraged to incorporate it into learner driver training and will have the opportunity to discuss the importance of setting the route prior to starting off and the dangers of changing this whilst driving.

Some young drivers may not realise that they must demonstrate that they are in control of the vehicle at all times and touching a sat nav whilst driving to change the route is, therefore, an illegal practice. It is also important for them to realise that they should not blindly follow the sat nav's directions as the suggested route may not always be appropriate, if for example, the sat nav's map has not been updated recently or there are temporary roadworks on a route.



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We agree that candidates should only be required to follow the directions provided by the sat nav during the test as it would not be fair to test them on their ability to use unfamiliar equipment, nor would it reflect their practical driving ability.

Sat navs will increase the number and variety of test routes which can be used from the centre because it will no longer be necessary to rely exclusively on road signs. Traditionally many test routes are primarily urban in nature; however, most fatalities occur on rural roads, with a disproportionate number involving younger inexperienced drivers. Where conditions allow the training and testing on rural and high speed roads is very important and RoSPA strongly supports measures which will allow this.

Including the use of sat navs in the test will provide ADI's an ideal opportunity to discuss where it should be located in the vehicle and the importance of not placing it where it could obscure the driver's vision, or be hit by an airbag if it deployed.

### **Modify Delivery of the Manoeuvres in the Test**

Driving habits have evolved over time. For many years, elements such as reversing around a corner and turning in the road have been traditional exercises that are generally performed on quiet roads. However, as road and traffic conditions change, the frequency that motorists are required to do manoeuvres may diminish. Whilst the intrinsic skills needed remain constant, the format of these manoeuvres can be modified to better reflect the reality of contemporary driving.

Therefore, the government propose to modify the delivery of manoeuvres so they are undertaken during the natural course of the drive during the test, in a less staged way than has traditionally been the case. They would be augmented by exercises such as driving in and reversing out of a parking bay or pulling up on the right, reversing for two car lengths and parking the vehicle before starting off and re-joining the flow of traffic. This would update the test to current traffic conditions, equipping successful candidates with transferrable skills which would be used in the course of driving.

### **Question 3**

**Do you agree with the proposal to modify manoeuvres so they take place during the natural course of the drive and augment them with new realistic exercises?**

#### **RoSPA Response**

RoSPA agrees with this proposal.

It is imperative that learner drivers have the skills to safely control and manoeuvre the vehicle in situations that reflect modern driving. This includes the ability to reverse in a straight line, pulling in and reversing out of a parking bay or pulling up on the right hand side of the road. Currently learner drivers are taught to reverse around a corner and how to turn in quiet roads. However, as driving conditions change these situations are less common. The proposed changes to test a candidate's ability to for example pull in and reverse out of a parking bay, pulling up on the right or reverse two car lengths and re join the flow of traffic are far more realistic skills which they will need to be able to safely carry out in normal traffic conditions once they have passed their test.



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When a car is being reversed out of a tight space such as a parking bay the driver has a limited view and pedestrians or approaching vehicles may not be visible. Therefore, RoSPA recommends that where possible it is better to reverse into the space and drive off forwards. For this reason it would be prudent to still include a reverse parking manoeuvre to ensure that both manoeuvres are pre taught prior to them taking their test.

Rule 239 of the Highway Code says 'Do not park facing against the traffic flow'. Instructing a candidate to pull up on the right, reversing for two car lengths and park the vehicle before starting off and re-joining the flow of traffic may cause some confusion. If this change is adopted the Highway Code may need to be amended accordingly.

Including these modified manoeuvres in the test, will encourage driver trainers to incorporate them in learner driver training to give learner drivers the necessary transferrable skills to be able to manoeuvre their vehicle in today's modern traffic conditions.

### **Change the Format for the Vehicle Safety Questions**

At present, a candidate is asked 2 vehicle safety questions - known as the 'show me, tell me' questions. The 'show me' question requires a demonstration, and the 'tell me' question an explanation, of a vehicle safety function.

It is important that a candidate's knowledge of the operation of the different elements of the vehicle is up to date, reflecting functions routinely available in contemporary vehicle design. The practical driving test needs to reflect the use of these elements, making provision for knowledge to be assessed effectively and efficiently. It is desirable to test some functions when the vehicle is in operation, for example, how a candidate would operate a rear heated screen while driving. Candidates would also be expected to know where and when it is safe to operate instruments and will be asked to perform the task when they consider it appropriate (for example, in heavy traffic on a fast moving roundabout would not be considered the ideal situation to operate an in-car facility, unless there were extenuating circumstances).

This would also allow the driving test to be better used to test a candidate's skills during the limited time available rather than taking time unnecessarily with questions and demonstrations that can be carried out during the on road element. Therefore, the Government propose that one of these two questions (for example a practical demonstration of operating the rear heated screen) is conducted during the on road part of the test, when the vehicle is in motion. The other question would, as now, be asked at the start of the test.

#### **Question 4**

**Do you agree with the proposal to change the format of vehicle safety questions so that one of the two questions is asked whilst on the move?**

#### **RoSPA Response**

RoSPA supports the proposal that one of these two questions is carried out during the on road part of the test as firstly this will save valuable time during the test which can then be used to allow more practical driving assessment. Secondly, it is important that candidates can demonstrate that they can use the in car safety features whilst driving. It is inevitable that at some point whilst driving that it will be necessary to clean the screen, therefore, using the 'show me' how you would clean the windscreen using the windscreen washers and wipers' during the practical drive is an ideal opportunity to test they can do this in live traffic conditions.



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## Question 5

### Other Comments

#### RoSPA Response

RoSPA wholeheartedly support the proposals in this consultation as an important step towards preparing young drivers for the demands of today's roads, especially during their most vulnerable period, namely the first year of driving.

Last year we called for the introduction of a series of radical measures designed to protect young drivers which included the recommendations contained within this consultation. If implemented it is essential that the impact of these measures is closely monitored and if it is shown that the risks that young drivers face has not diminished significantly then further measures should be introduced such as:

- A minimum learning period of one year so learners gain more driving experience during their learning period. As most learners take many months to pass their Test, this would not impose much additional burden on learner drivers.
- A mandatory Learner Driver Logbook in which the learner records how much and what type of driving they have undertaken would ensure the learning period is used effectively. It would act as a record of driving experience, help structure the learning to reflect the learning to drive syllabus, allow learners to measure their progress and ensure that they gain experience in a wide range of situations. It could encourage lessons and practice in adverse weather and in the dark so learners gain experience in these situations. And, it could act as a 'Test-readiness' tool.

The learning period should include (where possible) both professional lessons with private practice with a parent or friend. Good communication between the learner, the learner's parents and the ADI is also important. More should be done to encourage and make it easier for learners to take private practice to support their professional lessons. Parents need more guidance on helping their children as they learn to drive, and to understand that the example they themselves set as drivers is a significant influence on their children's driving attitudes and behaviour.

RoSPA thanks the Driver and Vehicle Standards Agency for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

Road Safety Department  
RoSPA  
28 Calthorpe Road  
Birmingham B15 1RP  
[www.rospace.com](http://www.rospace.com)





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**RoSPA Head Office**

28 Calthorpe Road  
Birmingham  
B15 1RP  
☎ +44 (0)121 248 2000

**RoSPA Scotland**

43 Discovery Terrace  
Livingstone House  
Heriot-Watt University Research Park  
Edinburgh  
EH14 4AP  
☎ +44 (0)131 449 9378/79

**RoSPA Wales**

2nd Floor  
2 Cwrt-y-Parc  
Parc Ty Glas  
Cardiff Business Park  
Llanishen  
Cardiff  
CF14 5GH  
☎ +44 (0)2920 250600

**General Enquiries**

☎ +44 (0)121 248 2000  
☎ +44 (0)121 248 2001  
✉ help@rospa.com  
🐦 twitter.com/rospa  
📘 facebook.com/rospa  
🌐 linkedin.com/rospa

**www.rospa.com**

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