



accidents don't have to happen

# **RoSPA Response to “Graduated Driver Licensing and Changes to the Practical Driving Test”**

A Driver and Vehicle Agency (Northern Ireland)  
Consultation Paper

17 January 2018



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

## Introduction

This is RoSPA’s response to the Northern Ireland Driver and Vehicle Agency’s consultation paper “Graduated Driver Licensing and Changes to the Practical Driving Test’. It has been produced following consultation with RoSPA’s National Road Safety Committee.

The Driver and Vehicle Agency has previously consulted on the measures to introduce Graduated Driver Licensing (GDL) in Northern Ireland. RoSPA’s response to that consultation can be viewed on our website at [Proposed Changes to the Learner and Restricted Driver Schemes and on Graduated Driver Licensing](#).

This current consultation seeks views on the package of measures to reform the learner and restricted driver/rider schemes and to introduce GDL in Northern Ireland. These include:

- Introducing a six month mandatory minimum learning period (this will not apply to motorcyclists)
- Introducing a programme of training
- Introducing a compulsory student logbook
- Removing the 45 mph speed restriction to allow lessons to be taken on a motorway, where appropriate
- Introducing a passenger carrying restriction (this will not apply to motorcyclists)
- Extending the current 12 month restriction period for new drivers to 24 months
- Requiring new drivers to display a distinguishing mark (plate) on their vehicle for two years after receiving a full licence.

RoSPA’s responses to the consultation questions are below.

### Exemptions from Mandatory Minimum Learning Period

The mandatory minimum learning period will require learner drivers (cars and light vans, but not motorcycles) to hold a provisional driving licence for a minimum period of six months before they can apply for a practical driving test. It is intended to help learner drivers to build their driving experience over time and under supervision. Some exemptions to the minimum learning period are allowed, but some further exemptions are proposed.

#### Question 1

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

#### RoSPA’s Response

Carers may be the main support for vulnerable individuals who may lose this support if their carer must wait for at least six months before they can take their driving test. On average it takes learner drivers around 7 to 9 months from obtaining their provisional licence to passing their driving test. Therefore, we are not convinced that the exemption from the six month minimum learning period is necessary. However, we do not object to learners being allowed to apply for the exemption if they can show that the minimum learning period would cause hardship for a person for whom they care, and if they can show that they have taken the required driver training programme that all learner drivers will be required to follow.



Response to "Graduated Driver Licensing and Changes to the Practical Driving Test" Consultation Paper

### Question 2

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

#### RoSPA's Response

The Armed Forces believe that the proposed minimum learning period would seriously affect their operational ability as it would take longer to train army recruits in Northern Ireland. Given that Army trainees in Northern Ireland are trained by a third party driving school and tested by Army driving examiners, who undergo the same training as the Driver and Vehicle Agency (DVA) driving examiners and are re checked annually, RoSPA agrees that it is reasonable to exempt members of the Armed Forces from the mandatory minimum learning period.

### Question 3

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

#### RoSPA's Response

RoSPA has no further suggestions to make.

### Exemption from completing a logbook

### Question 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?**

#### RoSPA's Response

The GDL scheme already exempts those who have had their licence revoked or who have been disqualified until they pass a retest from the requirement to complete the minimum learning period because GDL is designed to help inexperienced drivers, not experienced ones. The logbook will be linked to the training programme for learner drivers and so may not be relevant to experienced drivers who have been disqualified from driving. Therefore, RoSPA agrees that drivers who have been disqualified should be exempt from having to complete a logbook that has been specifically designed for learner drivers.

However, we do not agree that new drivers who have had their licence revoked within two years of gaining it should be so exempt. Such drivers are not necessarily very experienced, and arguably their learner driver training was not effective. Therefore, we believe that it is reasonable for them to be required to complete a learner driver logbook again.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

## Motorway driving

### Question 5

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

#### RoSPA’s Response

RoSPA thinks that motorway lessons for learner drivers should only be permitted when accompanied by a fully qualified approved driving instructor. Fully qualified ADIs have the required skills to teach people to drive, having passed a dedicated training process and a test of their ability to instruct pupils and they are subject to Standards Checks.

Allowing other supervising drivers, such as parents, to take learner drivers onto motorways would increase the risk given the more difficult driving circumstances of motorway traffic. They are unlikely to have dual control cars, and would not know how to use dual controls safely without training. We do not feel that they would have the skills and experience to teach someone else how to drive safely on a motorway. Given the higher speeds, any mistake could have severe consequences given higher speeds usually involved in motorway driving.

## Motorway riding

### Question 6

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

#### RoSPA’s Response

In Britain, the forthcoming change in the law to allow learner drivers to take lessons on motorways, in a dual controlled car and when accompanied by an ADI, will not apply to learner motorcyclists, a decision that RoSPA supported. However, given that in Northern Ireland it has been decided to allow learner motorcyclists learners on category A1 motorcycles to use motorways, RoSPA agrees that they should only be permitted to do so when accompanied by an Approved Motorcycle Instructor (AMI), who must also be riding a motorcycle. The AMI must be in contact with the learner using a radio which is not hand held and both the AMI and the learner must be wearing high visibility clothing.

### Question 7

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

#### RoSPA’s Response

Guidance for ADIs and AMIs on giving motorway lessons should include when to incorporate motorway driving and how to assess that the learner is ready for motorway driving, the length of lessons and proximity to a motorway, and the consideration of appropriate conditions, such as, weather or traffic conditions, for a motorway lesson. They must ensure that each learner is sufficiently competent to progress onto the motorway and have a good understanding of motorway rules before going onto a motorway. The guidance should also encourage ADIs and AMIs to teach the higher speed driving skills on dual carriageways, especially those which have the national speed limit, before starting motorway lessons with a learner. It should also advise them to avoid using motorways during busy periods (especially in early motorway lessons) where possible.



Response to "Graduated Driver Licensing and Changes to the Practical Driving Test" Consultation Paper

## Transitional Arrangements

### Question 8

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

#### RoSPA's Response

RoSPA thinks that learners who hold a provisional licence they acquired before the Graduated Driver Licensing rules came into force should not be permitted to drive on motorways until the end of the six month transitional period following the launch of the Graduated Driver Licensing scheme.

## New plating arrangements

In Northern Ireland all newly-qualified drivers are required to display an R plate for 12 months after passing their practical driving test. However, the new GDL rules will introduce new post-test restrictions, such as the passenger and night-time driving restrictions, for the first six months following the test.

### Question 9

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

#### RoSPA's Response

RoSPA agrees that it will be necessary for the police to be able to differentiate between current R scheme drivers and those subject to the GDL scheme.

### Question 10

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

#### RoSPA's Response

RoSPA has no comment to make on this question

### Question 11

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

#### RoSPA's Response

RoSPA has no comment to make on this question



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

## Exemption from Passenger Restriction

### Question 12

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

#### RoSPA's Response

RoSPA agrees that drivers of vehicles that are restricted to a maximum speed of 45mph or less should be exempt from the passenger restriction. These vehicles include industrial tractors used within industrial premises, certain fork lift trucks, showman's vehicles and track laying vehicles and they are largely used on private roads or on premises as part of an industrial operation. They are driven at low speeds (and in most cases are not capable of high speeds) and have limited or no passenger capacity. They are not the type of vehicle driven by novice drivers and are not the focus of GDL.

## Programme of training

The new GDL scheme will be accompanied by a Programme of training that must be completed by learner drivers and riders. The Programme will be published as an A5 Book with different versions for drivers and motorcyclists.

### Question 13

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

#### RoSPA's Response

RoSPA agrees that Introduction section includes all the relevant topics:

- Learning to drive – The key knowledge and practical skills required to drive safely
- Background and general information on the Programme and GDL
- Law/ Rules & Regulations relating to learning to drive
- Vehicle/ Driver Licensing – what is required and how to get it
- Driver Testing – a high level outline of the driving test
- Resources to help you learn to drive.

### Question 14

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

#### RoSPA's Response

RoSPA thinks that it is very important for the training programme to address driving and riding behaviours and attitudes.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

#### **Question 15**

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

#### **RoSPA’s Response**

RoSPA agrees that Skills for Life section should aim to make drivers more aware of their responsibilities and their interaction with other road users. It should describe the knowledge, understanding, skills and behaviours required to be a safe and responsible driver from a theoretical point of view.

#### **Question 16**

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

#### **Question 17**

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

#### **Question 18**

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

#### **RoSPA’s Response**

RoSPA agrees that the proposed modular approach is sensible and appropriate, that the modules listed cover the required areas and each module should address behaviours and attitudes.

#### **Question 19**

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

#### **Question 20**

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

#### **RoSPA’s Response**

RoSPA agrees that each module should include scenarios based on potential situations learner drivers may encounter. We agree that each module should include worksheets that have to be completed to show the learner’s thought process around decision making and consequences.

#### **Question 21**

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

#### **RoSPA’s Response**

RoSPA believes that the main format for the training booklet should be online. However, as not everyone uses the internet, it should also be available as a printed copy.

#### **Question 22**

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

#### **RoSPA’s Response**

RoSPA does not have a strong opinion about this question.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

### **Question 23**

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

#### **RoSPA’s Response**

RoSPA thinks that if the programme is made available online, it should be provided in a website, an app and in any other format that maximises its availability and accessibility.

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

#### **Question 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?**

#### **Question 25**

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

#### **Question 26**

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

#### **RoSPA’s Response**

RoSPA agree that learners should gain their full driving licence within two years of completing their logbook. If a learner fails to gain their full licence in this period, they should be required to have the logbook checked, re-verified and dated.

#### **Question 27**

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

#### **Question 28**

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

#### **RoSPA’s Response**

RoSPA agrees that the logbook should record the proposed additional information.

#### **Question 29**

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

#### **RoSPA’s Response**

RoSPA believes that the main format for the logbook booklet should be online. However, as not everyone uses the internet, it should also be available as a printed copy.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

### Question 30

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

#### RoSPA's Response

RoSPA believes the extra charge is reasonable, but the Department should make every effort to ensure that it does not prevent people on low incomes being able to access the logbook or the driver licensing regime.

While some learners would be willing to pay extra, this introduces the question of fairness, and the DVA will need to avoid a perception that candidates can gain an advantage if they pay more, and that fairness and equal opportunity are maintained and safety standards are not compromised.

### Proposed changes to the driving test

#### Question 31

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

#### RoSPA's Response

RoSPA agrees that it is reasonable to consider whether the hours in which driving tests are taken could be extended, but the implications for candidates and examiners, and for other road users, must be carefully considered. A number of factors are important, including safety, consistency, access to suitable roads and routes, congestion and the impact on local people and businesses.

Safe access to and from the test venue, allocated car parking and pedestrian safety (for candidates walking to and from their car and the test centre) during any extended hours must be considered, as should the provision of refreshment and toilet facilities for both trainers, candidates and examiners. The likely effect of extended hours on local congestion, people and businesses should also be considered. Traffic levels are likely to increase at certain times of the day.

#### Question 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?**

#### RoSPA's Response

RoSPA is concerned that using artificial light for the eyesight test might make the test significantly different from when it is conducted in good daylight. Therefore, a careful and detailed risk assessment should be conducted before a decision is taken.

#### Question 33

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

#### RoSPA's Response

RoSPA believes that some people would make use of this option



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

### **Developing the ‘show me, and, ‘tell me’, element of the car practical test (technical questions)**

#### **Question 34**

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

#### **Question 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?**

#### **Question 36**

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

#### **RoSPA’s Response**

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 new vehicles. It is desirable to test some functions when the vehicle is being driven, for example, how a candidate would operate a rear heated screen while driving, because this is how they are used in real life.

Therefore, RoSPA supports the proposal that one of the two questions is carried out during the on road part of the test as this will save valuable time during the test which can then be used to allow more practical driving assessment, and it is important that candidates can demonstrate that they can use the in car safety features whilst driving. Candidates should also be expected to know where and when it is safe to operate instruments and be asked to perform the task when they consider it appropriate.

#### **Question 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)?**

#### **Question 38**

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

#### **Question 39**

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

#### **RoSPA’s Response**

Driving test routes should be designed to reflect the real-world driving conditions that drivers will face when driving unaccompanied after passing the test. They should incorporate as many different types of road, junctions, speed limits and static hazards as possible.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

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

**Question 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?**

**RoSPA’s Response**

RoSPA believes that driving in a non-eco-safe way should be included as a possible reason for failure.

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

**Question 41**

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

**RoSPA’s 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 in Britain and recognised the potential an additional 10 minutes could make in allowing candidates to drive in different road and traffic conditions. This is why we supported the introduction of this change in Britain, and why we support its introduction in Northern Ireland.

Young drivers are most at risk immediately after passing their test and in their first year of driving. They 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.

**Question 42**

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

**RoSPA’s Response**

It is important that the content of the practical driving test is adapted to reflect the road and traffic conditions at the time it is conducted. Therefore, RoSPA agrees with this proposal.

Many drivers, and young people 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.



Response to “Graduated Driver Licensing and Changes to the Practical Driving Test” Consultation Paper

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. It is also important for new drivers 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.

**Question 43**

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

**RoSPA's Response**

RoSPA believes that allowing sat navs to be used in the motorcycling test should be considered once it becomes practical to do so. A decision should only be taken after a careful risk assessment.

**Question 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?**

**RoSPA's Response**

In the interests of fairness, it is important that the sat navs used in the test are the same so that no candidates gain advantages or suffer disadvantages by providing their own specific sat nav. This means that the person providing the vehicle for the test must permit the Department to temporarily fit a sat nav in the vehicle for the duration of the driving test.

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

**Question 45**

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

**RoSPA's Response**

RoSPA agrees that this could be beneficial.

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

**RoSPA's Response**

RoSPA is not able to answer this question.



Response to "Graduated Driver Licensing and Changes to the Practical Driving Test" Consultation Paper

### **Additional Information**

#### **Question 47**

**What Age Category do you fall into?**

#### **RoSPA's Response**

50 to 64 years.

#### **Question 48**

**What Identification Category do you fall into?**

#### **Question 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.**

#### **RoSPA's Response**

RoSPA is an accident prevention charity.

RoSPA thanks the Driver and Vehicle 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.rospa.com](http://www.rospa.com)





accidents don't have to happen

---

**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**

Registered Charity No. 207823  
VAT Registration No. 655 131649

