



Department of Transport Motoring Services Strategy

Response from National Associations Strategic Partnership

The Organisation

NASP is a collaborative working group for the main national approved driving instructor associations. It is formed from the representatives of the 4 main membership associations for driver trainers in the UK.

These include:

ADINJC Approved Driving Instructors National Joint Council

DIA Driving Instructors Association

DISC Driving Instructors Scottish Council

MSA Motor Schools Association

Each association has returned an individual response to the consultation however NASP wanted to collate their findings and make a final response from our results.

Gathering our Views

Each individual association has circulated the consultation document and published its details in their industry newsletters, websites and magazines. We have also gathered views and comments from members via email, through discussion at meetings and through social media. DIA has additionally run an online survey, resulting in responses from over 800 ADIs ¹and jointly organised a live webchat with Department for Transport to allow ADIs to ask questions about the consultation.

NASP has placed the consultation document on its website at www.n-a-s-p.co.uk and the consultation was discussed at a recent meeting together on December 1st with DVSA.

NASP Responses to the key questions concerning driver trainers:

User Experience

Q1. As we change the practical driving test to ensure it reflects the modern driving experience, what views do respondents have about how we can maintain standards and give candidates clear information about the competencies tested in the driving test?

Whilst NASP fully supports the trials for changing the practical test the wording of this question concerns us as it suggests the test will be changed regardless of the results of the trial. We understood a full consultation would take place after the trial was completed. Our understanding is that around 92% of candidates take some form of professional training so the second half of the question seems to infer that ADIs do not make it clear to candidates what competencies are tested in the driving test. There is a host of information available for learners and driving instructors to disseminate information about the test but it does also rely on learners absorbing the knowledge and gaining as much valuable practical supervised practice as possible to gain experience.

¹ Results have been incorporated into DIA's individual response to the consultation

Making the test competency based rather than the current fault based test may help ensure it reflects a modern approach. One suggestion we would make is that it could be changed to a format similar to the Standards Check where candidates have to achieve a pre-defined score across a range of requirements, with risk assessment as a core element – and where if a minimum score was not achieved in this category it would result in a failure regardless of other competencies.

Overall we urge the government to seriously consider the longer term human and economic benefits of introducing a robust mandatory and graduated learning to drive process, rather than on purely further tinkering around with one ultimate test. Pushbacks on proposals for a mandated pre-test learning process, such as the cost to implement or the difficulty of introducing new regulation, can be in many ways countered by the fact that there is already widespread adoption of a minimum mandatory learning process across the world, in economies far less developed than the UK and with less robust licensing and driver administration processes than we have here (as well as in places such as the New Zealand and Australia who are much vaunted by road safety professionals for their graduated learning and licensing approach).

The wider cost savings achieved through less crashes amongst novice drivers should more than justify investment in the infrastructure and process to implement a new learning to drive process. The cost to implement the proposed deposit scheme would also be considerable and this is not as holistic a solution. In the new Road Safety Plan additionally (launched on 21 December by DfT) consideration is already being given to encouraging core learning activity pre-test with the proposal that learners undergo motorway training pre-test - which in itself requires amendment to existing regulation. The test deposit scheme is seen as something which could be useful in incentivising a longer period of learning and better preparation but it does not solve the issue of ensuring sufficient key competencies are trained and developed pre test and that a sufficient quality of professional training is given for a sufficient period of learning (suitable to individual candidates needs). Mandating a core competency based approach to learning to drive, led by a professional instructor, is already the norm in many other European countries and the driver training industry would welcome further discussions in this vein and can help shape how this could be implemented with least impact on regulation and the public purse.

If we truly want to *maintain standards and give candidates clear information about the competencies tested in the driving test* the route to achieve this is ensure they have a clear pathway to achieve these competence pre and post test. We have a curriculum already in place and a set of National Standards on which to base a competency framework – we also have a workforce of qualified and government licensed professional driver trainers (ADIs) who can deliver this system – with relatively little investment needed from government to facilitate.

Q2. Driving tests might be offered from a wide range of venues. What factors should be considered in deciding on these?

Key considerations are the following:

Cost and value for money (of the venue and service provided); quality, training and expertise of examiners (especially if delegated examiners are used); availability; accessibility (both in terms of local road access, parking and in terms of access for candidates and instructors with disabilities); location: oversight and monitoring of venues and providers: security and safety (especially if evening slots become the norm).

A minimum standard might be described as: appropriate routes, good road access to the test centre, waiting area with toilet facilities and privacy for the candidate and their accompanying driver (so it doesn't increase the stress the candidate will already be feeling). A water or vending machine would be welcome.

Q3. We are interested to hear whether respondents would be willing to pay extra for more flexibility of driving test slots, both in terms of timing and location.

On checking the Gov.Uk website candidates already pay more for tests taken from 4.30 onwards and at weekends and Bank Holidays. In the case of category B tests £13 more so there is a demand for these tests.

Many of our members queried why anyone should have to pay more for the privilege of getting the flexibility of different times or locations. In this era services should be offered to suit the candidate and be client centred. Couldn't improvements of this nature be achieved through changes in working practices and efficiencies? The actual quality of the service provided would be no different, so it's questionable if it is a premium service at all. Therefore why should there be a premium price. However the candidates may well be willing to be pay more if they were picked up from home and the location was their choice.

Members are more concerned and indeed understandably annoyed at the current long waiting times for tests. As we respond to this consultation some areas in the country have no available tests at all, Cambridge being a case in point. Many felt time would be better spent managing this issue first.

However we recognise that as consumers we rightly want choice and flexibility in terms of how and when we consume key products and services. Offering flexibility in terms of test slots gives candidates more choice and helps those in the increasing 25+ age group to fit tests around working hours. Paying more for more flexibility has become the norm societally and meets client needs however, we do need to be careful of creating an unfair system where those who cannot afford to pay extra are not disadvantaged by long waiting times for test slots.

Q4. What could be done to ensure that candidates are better prepared for their practical test?

The document states:

"A fifth of all those killed and seriously injured on our roads are aged 17-24. A sizeable proportion of those passed their driving test fewer than six months before the collision. A review of international approaches to learning to drive showed that greater and more varied experience pre-test lowered the likelihood of a new driver being in an accident post-test.

"Around 1.5m tests are conducted each year; under a quarter (21%) result in a first time pass, the remainder are fails (53%) or people who pass on their second or subsequent attempt (26%). Encouraging learner drivers to take more practice before attempting their first test could reduce the total number of attempts taken to pass the driving test and lower the likelihood of their being in an accident post-test."

This statement seems to imply that the first time pass rate is 21% which is not true. The first time pass rate is actually 47.6%¹. In round terms about half of candidates pass first time, about half of those who fail first time pass second time, about half of those who fail second time pass third time etc.

A number of logged off minimum hours could be mandated as proposed by TRL. This would make people better prepared but will not stop people failing tests.

The document states that there *"is anecdotal evidence that some learner drivers are booking a practical test date well in advance – then taking the test at that time whether or not they are ready."* ADIs are struggling with the lengthy waiting times and helping clients plan when to apply for a test. If a candidate fails often the current extreme wait for the next test now means they can't afford lessons on a regular

basis in to the next test. We are concerned about the importance being placed on passing first time. There are other factors that can be relevant as well as how the pupil is trained:

- ADIs whose focus is on teaching pupils with specific educational needs who may well take more than one test.
- Areas of socio-economic deprivation where test rates may be lower generally (correlating to general education standards in a geographical area)
- The human factor of a candidate performing under pressure which cannot be attributed to the ADI

Current pass rates for ADI Part 2 tests and LGV tests are 55% and 54.3%² respectively. Both of these licence categories are mostly undertaken by very experienced drivers yet significant drivers still fail. We need to remember that 80% of young drivers do not crash in the first 6 months and that to date there is no evidence to show that those who pass 1st time have a lower post-test collision or violation rate.

We understand that research on 6,200³ motorists has shown that people who pass 2nd and 3rd time are actually safer drivers and:

- Less likely to be stopped by police
- Less likely to suffer road rage
- Less prone to using their mobile phone behind the wheel
- Have fewer penalty points
- Have had the fewest accidents in the last five years, and are unlikely to scare their passengers

If we truly want to see want better prepared candidates across the board, then the strategy should be to mandate a more robust pre-test programme of learning which delivers the required exposure to experience building practice as well as ensuring they have the necessary building blocks in place in terms of skills and knowledge to handle all roads, all conditions and all driving elements. Again, we urge the government to work with the driver training profession and seriously look at establishing a competency based learning process pre-test, where professional ADI and pupils work to achieve key learning goals en route to the test (recording and verifying achievement against set goals via an electronic log/work book much as they do in parts of the US, Australia and in New Zealand) and in which the test is not the only goal. The current proposals surrounding a deposit scheme continue to focus us largely on passing the test again being the only real goal in learning to drive when the ultimate goal in developing safe and competent independent drivers.

Q5. Would a financial incentive encourage learners to sit the test when they have a better chance of passing? At what level should such an incentive be set?

There is little doubt that candidates who take plenty of lessons and are able to get plenty of practice do have a better chance of passing their test first time. There is evidence that to pass a test takes an average of more than 40 lessons, and 20 hours of private practice.

² Department for Transport statistics Table DRT0202. Practical car test pass rates by number of attempts, age and gender, Great Britain: 2014/15 -

³ Source 'Safe drivers have already failed a driving test', The Telegraph February 19th 2010

According to the DVSA⁴, The cost of learning to drive including test fees, forty hours of driving lessons and twenty hours of private practice totals £2,582. DfT seems keen to persuade more learners to take private practice however, according to the stated figures the average cost of insurance for a provisional driver aged seventeen to nineteen is £1,422.

According to an MSA survey⁵ carried out a couple of years ago over seventy five per cent of instructors said that less than a quarter of their students took any private practice.

A DIA survey of over 1000 driver trainers (to date) on these current proposal currently sees the majority of ADIs struggling to see that this proposal would be attractive enough financially. Members have expressed concern whether there is in reality a 'cashback' figure which could be charged that would be substantial enough to persuade learners not to want to "have a go" at the test if they think they are ready. An unintended consequence of this cashback would be that ADIs who pay for a pupils test will get a refund!

It is in the nature of human beings to react differently when under pressure. The driving test itself is probably one of the most pressured situations a young person will find themselves experiencing. No matter how much preparation and extra training a candidate takes, driving test nerves will always play a part and this cannot be wholly managed by either training or a financial incentive.

Many ADIs feel that tinkering solely with the test again and offering incentives around performance on test should not be the focus, instead practical strategies to increase participation in sufficient preparatory learning pre test and additional development post test (such as developing a competency framework with a number of learning goals to be formally achieved, assessed and logged before test should be more seriously considered).

At what level should such an incentive be set?

The proposal would be unlikely to work unless the cost was sufficiently financially attractive high for candidates. Too low and it would be unlikely to change candidate's behaviour – too high and the charge would be viewed as punitive and could actually act as a barrier for young people learning to drive who are already struggling with costs.

Q5. What opportunities and risks do respondents see in alternative delivery models for the practical test? Q6. What factors are likely to attract potential partners to provide a service?

Our principal concern about alternative delivery models centre on standards and particularly uniformity of standards which we believe are currently delivered in a fair and open manner by DVSA. We would be concerned that any new provider had the ability to deliver in the same fair and open manner if driven by motives such as profit.

⁴ DVSA Infographic - https://www.safedrivingforlife.info/sites/default/files/The-cost-of-learning-to-drive_1.pdf

⁵ MSA Questionnaire about pupils - <http://www.msagb.com/news/media/MSA%20Questionnaire%20about%20pupils%20-%20Spring%202013.pdf>

However, before we look at what factors are likely to attract potential partners to provide a practical driving test service we believe it is far more important to review who should and could provide this service – and what their key criteria should be for both the provision of the service and the body which provides it. The opportunity to provide a testing service will already be attractive to many of those public and private sector bodies already involved in road safety delivery, driver training and also general education and assessment service brands. We already have an issue in road safety delivery (particularly in driver education) in general that there are a number of non-expert, non-specifically qualified and inexperienced stakeholders jumping on a (often publicly funded) bandwagon to deliver interventions which struggle to prove their efficacy. Amongst these are public sector services who may have the property infrastructure and personnel with capacity to provide test delivery, and for whom there is increasingly a pressure to find other roles, but we must ensure that whoever delivers this service ultimately has the necessary knowledge, experience and understanding of driver education as well as the ability to deliver logistically and administratively - and we are not convinced there are many single agencies that currently fit that headline criteria. We would urge the government to consult further with stakeholders with expertise in professional driver training and assessment, and equally with those agencies experienced in the provision of large outsourced activity, to help build the criteria for this model before worrying about making it attractive to partners. It is possible that delivery models and partnerships could indeed emerge out of that discussion making this process easier and more robust.

7. What are the most important actions we should take to streamline the LGV driver licensing process, while ensuring standards are maintained?

There is currently a shortfall of over 30,000 LGV drivers which could be in some ways resolved by removing the barriers to operators recruiting younger drivers for their fleets. Currently the cost of insuring younger fleet drivers is punitive yet there is little compelling evidence to show that younger LGV drivers are more risky. We would suggest that insurers have a large role to play in facilitating more fleets being able to recruit younger LGV drivers. To further limit their risk and increase their competency more accessible training routes for younger entrants could be developed such as apprenticeships and other funded training schemes.

In addition there is a strong feeling amongst the driver training community that the current CPC process is not entirely fit for purpose if the purpose is to develop competence, skills and knowledge. Currently the system is flawed as it allows candidates to repeat the same courses and same learning year and after year and, in some cases, simply attend a course with no robust assessment of any learning having taken place. Standards need to be raised of both provider, content and learning routes. CPC has become somewhat of a cashcow and there is a concern this is reflected in the quality and 'sausage factory' approach to the training on offer.

Developing a more robust curriculum for LGV drivers with more of an emphasis on progressive learning routes (verses repeating the same courses year after year, which as well not developing the driver, does nothing to engage them in learning further) in conjunction with driver education and training bodies would be a more effective path forward on CPC.

Q8. Do respondents believe that the on-road and manoeuvring components of the LGV test could be conducted separately with benefit to the haulage industry?

There are many poorly geographic locations for test routes but have a commercial haulage site where off road manoeuvres could be conducted in that area. During significantly large parts for a day, haulage firms

have spare land where the off road element could be accommodated, their location is not always conducive for start and end of a test route but would benefit the industry with access more locally for the conducting of off road element, so customers/candidates do not have so far to travel to complete an off road section being separate to the on road practical tests, thus saving time, and allowing more time for the practical test which could then incorporate the driver CPC part 4 (practical examination) 30 minutes at the close of the test if that option is chosen. (giving a greater saving in time and cost to both the candidate and the DVSA).

Q9. We would be interested to hear suggestions on how, and not only in relation to vocational drivers, the Drivers Medical service might resolve cases more quickly?

Allowing employers or driver trainers access to medical information (which may influence their driving ability or performance or which can usefully inform their individual driver training programme) would be valuable. Increasing online access to these records would be highly beneficial to trainers and employers.

Not having the full details of what the government is considering trialling it is difficult to see where the government is coming from on this issue, delays seem to be with the DVLA medical section who are slow to respond and frequently issue confusing and often conflicting letters of information to the drivers concerned, the use of too many generic letters not covering the specific medical issues as 'a wait and see' stop gap to the driver while they make further enquires or decisions. Greater guidance to the medical profession is necessary as their knowledge of the impact of medical conditions or health issues on driver is not always suitable to make the decisions they do. Greater connection and collaboration with driver trainers and the medical community would help both parties develop their knowledge. Perhaps a number of suitably trained GP, Ophthalmic opticians and other medical experts able deliver a better link between the DVSA medical group and the average GP would help sift any issues more quickly. Medicals to drive after 45 could also be considered. Non medical such as testing for dementia can be done through an optician but legislation prevents that information being released, can this area be explored with more rigour in the future.

Digital Services

Q.15 What more could be done to expand and increase the use of digital services offered by the motoring agencies and what should be done for those who cannot or choose not to use a digital service?

An increase in digital services is inevitable and has and will help to keep down the cost of driving tests as well as providing a more accessible and efficient service for users.

The reasonable alternative seems to be keeping telephone help alongside as often digital services can generate issues for users who cannot access online services but all users may sometimes simply be unable to access these services when there is broadband outage issues, network breakdowns and provider server issues. Additional sources of information and advice via additional channels of communication should always be available. In addition the nature of an ADIs work means that they cannot afford to hold on for half an hour to speak to an operator nor can they always readily access digital services given their main operational base is a vehicle.

As mentioned above ability to access medical information online which impacts driving would be a valuable digital service, as online licence checking has been.

Expediting online booking for Standards Checks would also be a huge benefit to the DVSA and services users. This has been long promised but non-delivered to date. With the addition of rider trainers now to the Standards Check regime we need an online service for this area of DVSA provision.

Deregulation

Are there any other areas of regulation administered or enforced by the motoring agencies, which you consider should be reviewed and potentially be safely reduced during the next four years?

The regulations prohibiting category B learner drivers from driving on motorways should be relaxed to allow them onto motorways with a qualified DVSA ADI.

It would appear that most people are convinced by this argument in July 2007 the House of Commons Transport Committee stated in its report into Novice Drivers⁶ “We agree Learner drivers should be allowed onto high speed roads, and if necessary onto motorways — because in some places these are the only high speed roads to be found.”

On the 8 Nov 2011 Mike Penning MP then Parliamentary Under - Secretary of State at DfT stated in a debate in the House of Commons⁷ that Learner drivers would be allowed on motorways. “I think we need to give people, particularly young people, the opportunity to learn how to drive on the motorway before they pass their test. That is why we will pass regulations to allow qualified driving instructors to take learners on to motorways.”

Additionally the DfT’s Road Safety Plan, published on 21st December 2015 (Working Together to Build a Safer Road System British Road Safety Statement) includes the following proposals:

- learner drivers will for the first time be offered the opportunity to drive on motorways
- the proposals would see learners allowed to take a motorway driving lesson with an approved driving instructor in a dual controlled car - this is designed to make drivers safer once they have passed their test

It should be noted that this is not just a matter of safety on motorways it also about educating all drivers that motorways are the safest and most economical roads to use in July 2015 the AA Charitable Trust⁸ stated that “Almost half of motorists know friends or family who avoid driving on motorways with more than one in 10 women saying that they themselves avoid driving on motorways due to nerves. One quarter of drivers are even nervous when they know that family or friends are making a journey on a motorway. New figures show that one in 50 people, 13,000 per day, planning a route are driving extra miles by choosing routes that avoid motorways as they are too nervous to tackle the multilane roads.

Conclusions

⁶ House of Commons Transport Committee, Novice Drivers, Seventh Report of Session 2006–07.

<http://www.publications.parliament.uk/pa/cm200607/cmselect/cmtran/355/355i.pdf>

⁷ Hansard 8 Nov 2011 : Column 254 -

<http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111108/debtext/111108-0003.htm#11110882000032>

⁸ The AA- Motorway Paranoia - <https://www.theaa.com/newsroom/news-2015/aa-charity-offers-free-motorway-courses.html>

Whilst NASP members welcome this consultation as an opportunity to offer feedback, as well as debate and discuss ideas and proposals designed to improve and evolve motoring services in the UK, they are concerned that some proposals need much further and closer consultation with professional practitioner groups, such as driver trainers, in order to understand how they could work most effectively or be effective in practice at all. There are also proposals that the ADI community in particular would see as more effective strategies to tackle road safety, or improve motoring services, which have not yet been fully explored and we would welcome further consultation and dialogue on those issues and potential solutions.

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