

PROPOSALS FOR THE REFORM OF THE PRACTICAL DRIVING TEST IN IRELAND

Public Consultation Document

Driver Testing June 2014

Údarás Um Shábháilteacht Ar Bhóithre Road Safety Authority

Contents

- 1. Introduction
- 2. Background & the legislative context
- 3. Summary of proposals
- 4. International experience
- 5. Driving test reform options
- 6. Invitation to comment your views

1. Introduction

The objective of this document is to engage all of those involved in the learning to drive process in discussion as to what their views are on certain aspects of the driving test and proposed reforms to how the test is conducted. The over-arching principle is to ensure that the driving test in Ireland continues to contribute to the Road Safety Authority's mission of reducing road fatalities and serious injuries on our roads. The document sets out suggestions for reform to the current practical driving test and seeks feedback in relation to those proposals.

The consultative process lasts until the 18th July 2014 and you are invited to contribute by commenting on the proposals and/or making formal submissions.

Following the consultation process, the Road Safety Authority will prepare plans for aspects of the driving test which will be subject to reform, and these will take into account the submissions received in response to this document.

2. Background and legislative context

The Driver Testing Section conducts in the region of 140,000 driving tests annually across 49 Driving Test Centres nationally. Since 2008, an extensive programme of change has been implemented to the way in which drivers are educated, trained, tested and licenced in Ireland, most notably with the introduction of regulated driving instruction through Approved Driving Instructors, and the introduction of initiatives such as Essential Driver Training for car learner drivers, Initial Basic Training for learner motorcyclists, and Driver Certificate of Professional Competence for bus and HGV drivers.

The most recent legislative changes to the driving test occurred in 2013 with the implementation of the EU Directive 126/2006/EC. These changes included the introduction of a new category of motorcycle for the driving test, the A2, and the requirement for candidates for trailer

and HGV tests to attend the driving test with a minimum load on their vehicle.

All of these initiatives have implications for the way driver testing and assessment is carried out in Ireland.

The driving test contents are governed by EU Directives and the minimum testing criteria are set out by these and translated into national legislation.

As 2014 sees the 50th anniversary of the first driving test conducted in Ireland, this is an opportunity for you to voice your opinion on how the driving test should be conducted as we launch into the next 50 years.

3. Summary of proposals

In the context of the minimum criteria required by law to be included in the driving test, the Road Safety Authority conducted a review in 2013 to ensure compliance and alongside this, examined ways the present method of testing could be enhanced. The following is a summary of the recommendations for change, and these are further expanded in Section 5 – Driving Test reform Options.

Reference	Recommendation	Comment
1	Increase the amount of time of on-road driving time	This recommendation is to increase the amount of time a test candidate is on the road driving without increasing the overall test slot time.
2	Introduce independent driving into the practical driving tests	Driving without direction from a Driver Tester during the test. Allows the test candidate to take responsibility for their own driving and make driving related decisions during the test.
3	Include the assessment of eco-driving techniques in the practical test	Eco driving is an energy efficient driving style. Aspects of eco driving are presently a part of the driving test. What is under consideration here is whether eco-driving principles should be incorporated as a fault incurring aspect of the driving test contributing to the overall pass or fail of a candidate.
4	Hazard management should be assessed in the practical test	Good hazard perception skills increase the likelihood that drivers will behave in ways which reduce their exposure to risk. Under consideration at present is whether greater focus should be given to assessing a candidate's ability to perceive and manage hazards as a part of the practical driving test.
5	Change the emphasis of the oral part of the practical test to be an	This recommendation looks to replace assessing test candidate's knowledge of the rules of the road with checking that they have greater

	assessment of	understanding of the rules and greater risk
	understanding	awareness.
6	Remove the oral part	This recommendation puts forward the option of
	of the practical test to	removing the oral questions asked of a driving
	allow for more	test candidate at the start of the test and replace
	emphasis to be put on	it with other aspects of assessment.
	the on road driving	
	assessment.	
7	Driver Tester feedback	This recommendation seeks to establish what is
	after the driving test	the best method and format for the delivery of
		feedback to the test candidate after the test.
8	HGV specific	This recommendation looks at reforms to HGV
	recommendations	tests, including higher order skills such as the
		introduction of commentary driving.

4. International Experience

When conducting the review of the current driving test, the RSA researched how initiatives under consideration were implemented in other driving test jurisdictions, with a view to establishing how successful they had been in the road safety context. Where relevant, we have included commentary on this research alongside the appropriate initiative in Section 5 – Driving Test reform Options for information purposes.

5. Driving Test Reform Options

Recommendation 1: Increase the amount of on-road driving time

The duration of on-road driving time should be increased without increasing the total length of the practical test.

It has long been recognised that the more time spent on the road during the assessment, the stronger the claim that can be made that the learner is safe to drive on the road network. Currently, the practical driving test for category B (car) is 50 minutes in total, with a mandatory 25 minutes on road driving time. Lengthening the minimum time on the road by five minutes would allow the Driver Tester to observe a wider range of behaviours in more situations and collect more evidence, which is known to improve the reliability and validity of assessment. This may mean that other aspects of the test may have to be shortened (for example the pre-test rules of the road questioning).

- Are you in favour with this recommendation?
- If so, what aspect of the test could be altered to accommodate it?
- If you are not in favour with this recommendation, why?

Recommendation 2: Introduce independent driving into the practical driving tests

Independent driving is where the test candidate drives without direction from a Driver Tester – it allows candidates to take responsibility for their driving and make their own driving related decisions.

Independent driving is not currently a part of the driving test in Ireland. Candidates are given directions by the Driver Tester. Independent driving has been introduced in the Netherlands, Great Britain, Finland and Sweden, with some documented success where it was perceived as "real" driving by test candidates and their Instructors. There are reports which show that learner drivers believe that "real driving" (driving as a licenced driver) is fundamentally different from the driving required to pass the practical test. The differences arise from a mixture of increased distraction and an increased cognitive workload during 'real driving'. Independent driving aims to assess how candidates' perform when placed under these additional demands.

The introduction of independent driving is dependent on an integrated driver training system. Independent driving has already been introduced into the training process in Ireland. Lessons 9 and 11 of the EDT programme encourage the learner to make independent driving decisions.

Independent driving could be achieved during the driving test as follows:

- Giving the candidate a set of general directions for a route which mimics the instructions given when a driver asks for directions
- Asking the candidate to follow road signs in order to reach a given location
- Asking the candidate to drive to a local landmark
- Asking for an action to be taken that requires a manoeuvre to be

carried out but letting the candidate decide exactly how, when and where to do it

The options are not mutually exclusive and not all of them need to be introduced.

- Are you in favour with the introduction of independent driving to the Driving Test?
- If so, how do you think it should be conducted?
- If you are not in favour with this recommendation, why?

Recommendation 3: Include the assessment of ecodriving techniques in the practical test

Eco driving is an energy efficient driving style. Aspects of eco driving are presently a part of the driving test.

Many eco-driving techniques are also recognisably safe driving techniques. Safe driving techniques are currently covered in the practical tests in Ireland for all vehicle categories. Examples include the ability to anticipate braking or slowing down well in advance and making proper use of controls, shifting gears between 2,000 and 2,500 revolutions; maintaining a steady speed, driving with low engine RPM; anticipating traffic flow; decelerating smoothly; when driving uphill using the highest gear possible with a deep accelerator position; and, driving around bends in a high gear, where safe and practical.

What is under consideration here is whether:

- (a) eco-driving principles should be incorporated as a fault incurring aspect of the driving test contributing to the overall pass or fail of a candidate, or
- **(b)** whether feedback on eco driving should be given to candidates at the end of the test but not contribute to the overall result of the test.
- Are you in favour of either of these recommendations?
- If so, which one and why?

If you are not in favour with these recommendations, why?

Recommendation 4: Hazard management should be assessed in the practical test

Good hazard perception skills increase the likelihood that drivers will behave in ways which reduce their exposure to risk. Under consideration at present is whether greater focus should be given to assessing a candidate's ability to perceive and manage hazards as a part of the practical driving test.

Assessment of hazard management can be achieved in the following ways:

- Normal driving (i.e. hazards encountered during the course of normal driving during the driving test
- Situational judgement exercises (e.g. show the candidate still pictures of driving scenarios they are likely to encounter and ask them to point out the main hazards and how they would react to that particular scenario).
- Delayed commentary (e.g. a candidate remembers the hazards they observe as they perform a driving manoeuvre and are then asked to describe the hazard and how they responded to them).
- Are you in favour of these recommendations?
- If so, which one and why?
- If you are not in favour with these recommendations, why?

Recommendation 5: Change the emphasis of the oral part of the practical test to be an assessment of understanding

This recommendation looks to replace assessing test candidate's knowledge of the rules of the road with checking that they have greater understanding of the rules and greater risk awareness.

This means changing the emphasis of the oral part of the practical test to ensure that it provides an assessment of candidates' understanding of the Rules of the Road. In order to do this, questions should be aimed at assessing whether the candidate understands the reasons why a particular rule or requirement is important. For example, why should you use dipped headlights? Or, why should you never cross a single white line along the centre of the road?

For consideration also is the possibility of moving this aspect of the test to the end, which would allow the questions to be tailored to the candidate's performance during the drive.

- Are you in favour of these recommendations?
- If so, which one and why?
- If you are not in favour with these recommendations, why?

Recommendation 6: Remove the oral part of the practical test to allow for more emphasis to be put on the on road driving assessment.

As the Rules of the Road is already assessed during the Driver Theory Test, this recommendation looks to replace assessing the test candidate's knowledge of the rules of the road with placing a greater emphasis on their on- road driving competence.

- Are you in favour of this recommendation?
- If you are not in favour with these recommendations, why?

Recommendation 7: Driver Tester feedback after the driving test

This recommendation seeks to establish what is the best method and format for the delivery of feedback to the test candidate after the test.

There are currently two methods of feedback used after the driving test – written and oral feedback. Written feedback is currently given in the form of a summary feedback form directly after the test, and a full report of the candidate's faults incurred is emailed or posted to them after the test. Oral feedback is given to candidates by the Driver Tester when they return to the test centre after completing the test.

To enhance the current feedback given, the following recommendations are under consideration:

 Introduction of the candidate completing self-assessment to the Driver Tester after the result has been issued to them (i.e. how they think they drove during the test, what elements of driving do they feel needs improvement, how they coped with a certain situation that arose during the test)

- Updating the current written feedback that is presently given
- The introduction of the ADI to accompany the practical driving test and attend for the feedback session
- Are you in favour of these recommendations?
- If so, which one and why?
- If you are not in favour with these recommendations, why?

Recommendation 8: HGV specific recommendations

This recommendation looks at reforms to HGV tests, including higher order skills such as the introduction of commentary driving.

What is under consideration here is the introduction of commentary driving to the practical tests for drivers of Category C and D vehicles because they are more advanced drivers and should be able to cope with the increased cognitive workload thought to distract novice drivers. Commentary driving requires the test candidate to speak to the Driver Tester during the test to highlight the hazards they perceive and the course of action they are going to take. The drivers would be expected to verbally describe, in a few words, the hazards they observe. Their response to the hazard should be assessed by observing their driving.

It is also being considered that the CPC Practical knowledge assessment should be enhanced by placing more emphasis on the candidates ability to give at least one practical demonstration on each of the following:

1. Load the vehicle with due regard for safety rules and proper vehicle use

- 2. Ensure passenger comfort and safety
- 3. Prevent criminality and trafficking in illegal immigrants
- 4. Prevent physical risks
- **5.** Assess emergency situations.

In Great Britain, candidates are asked to demonstrate their ability on a mock-up of a vehicle and are asked to perform a number of tasks including how to load, unload and secure a load on a mock-up vehicle as part of the CPC practical knowledge assessment.

- Are you in favour of these recommendations?
- If so, which one and why?
- If you are not in favour with these recommendations, why?

6. Invitation to comment – your views

The RSA is mindful that any reform to the driving test has consequences for learner drivers, the ADI community, and other parties to the driving test. We invite any person or organisation who wishes to make a submission on the proposals for reform, to contact us in writing through the following methods:

Via email:	drivingtest@rsa.ie
In writing to:	Suzanne McDonagh,
g	Driver Testing Public
	Consultation Submission,
	Driver Testing Section,
	Moy Valley Business Park,
	Primrose Hill,
	Ballina,
	Co. Mayo.

Submissions must be received no later than close of business on the 18th July 2014 and should state your name and the organisation you represent (if applicable).

Working To Save Lives

Údarás Um Shábháilteacht Ar Bhóithre

Road Safety Authority

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