

PACTS Response to the Motoring Services Strategy Consultation

1. 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?

PACTS Response:

Only one in five people pass their driving test first time which suggests that many candidates are unprepared to take the test.

PACTS is in favour of extending the learning period prior to taking the test as it is widely accepted that greater pre-test driving experience leads to safer post-test independent driving. Therefore, PACTS is open to suggestions as to how increased pre-test driving experience can be encouraged. This includes the proposed financial incentive, so long as a sufficient and evidence-based study of the proposals is carried out.

However, PACTS would prefer to see consideration of proven measures which incorporate a *minimum* learning period, such as a graduated driver licensing. Such schemes can also include specific driving experiences which should be gained, such as driving in adverse weather conditions and at night.

When considering changes to the practical driving test, it must be ensured that the test is of a sufficient standard to cover the right competencies needed for safe driving, as it is the competencies covered in the test which will determine what instructors teach and candidates learn. These should go beyond basic manoeuvring skills and cover the driving task more broadly.

PACTS would like to see the test feature competencies that clearly address safety issues, in particular, a greater emphasis on extended independent driving. Driving while utilising devices such as Satnavs could also be included.

Information on the competencies currently included in the tests is available, but learners may not read it thoroughly, or at all. The information needs to be better communicated to learner drivers during both professional lessons and private practice. Where possible, ADIs should also communicate with family and friends to make sure that the professional lessons and private practice are mutually supportive.

While professional experience should be encouraged, ensuring that family and friends who assist with private practice are aware of the test competencies would help to better instil them in the mind of the learner. It would also serve to improve the quality of private practice and may also help improve their own driving.

Effort should also be made to communicate the necessary information for those who are unable to read it, due to cultural (e.g. language), educational or other illiteracy problems. For example, audio versions could be provided.

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

PACTS Response:

When considering a wider range of venues a number of factors come into play. The location must be on an appropriate route with satisfactory access and facilities for both examiners, candidates and family and friends such as parking, pedestrian access and waiting areas.

Likely popularity and the potential number of test applicants must also be considered along with the proximity of existing test centres in the area.

Most importantly, the location of the test venue must ensure access to the necessary range of different driving environments needed to form a suitable test route (e.g. a combination of rural and urban roads). The test routes from a venue must also ensure that candidates face the same difficulty of test as those taking tests in other locations.

3. 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.

PACTS Response:

Certain options already exist that enable candidates to pay extra for increased flexibility. Given that these options already exist suggests that candidates are already willing to pay extra.

Although the idea of increasing the number and flexibility of driving test slots sounds like a positive one it depends on a number of factors, especially the flexibility of examiners. It must also take into account demand in certain areas while also making sure that tests remain of the same standard and rigour in all places and at all times.

Candidates may gain the impression that tests in certain locations and at certain times of day are easier due to lower levels of traffic. Conversely, candidates may avoid evening tests in winter months due to shorter hours of daylight. While they would provide an opportunity to test a candidate's night-time driving skills, they would also lead to a variation in testing environments.

Lastly, it is worth noting that if the proposed financial incentives were implemented, it may lead to a decrease in the number of tests being taken as candidates only choose to take tests when ready. Therefore, there could be a greater number of ordinary test slots available and less demand and take-up of 'flexible' test slots.

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

PACTS Response:

As covered in response to question one, there are a number of ways in which candidates can be better prepared for the practical test.

There is a clear correlation between increased pre-test driving experience and safer post-test driving. Anything which encourages increased learning, practice and experience prior to taking the test deserves to be considered. Candidates can increase their driving experience, have a better chance of passing the test and become a safer driver after passing.

In the absence of major changes to the learning and testing system (such as graduated driver licensing), incentives that encourage a longer learning period should be considered. This would help avoid intensive learning courses in which candidates learn skills and manoeuvres but don't fully develop a safe driving style that covers a full range of driving experiences and environments. However, research needs to be undertaken to decide the best incentives to use.

Proposals discussed above, aimed at increasing the availability and flexibility of test slots may also reduce the number of candidates booking packages comprising a set number of lessons and a driving test which serves to limit the amount of time they intend to spend learning. Ensuring that tests can be booked at short-notice when a learner feels they are ready will hopefully encourage them to avoid 'learning for the test'.

The competencies covered by the test should be well-communicated to candidates and those who assist in private practice. ADIs can be part of this process, discussing learning and practice techniques with candidates and their family and friends throughout the learning period. Mock tests could also be used to better judge whether or not a learner is ready to take the driving test

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

PACTS Response:

As mentioned in response to question four, PACTS believes that a financial incentive would likely encourage some learners to only sit the test when they have a better chance of passing. Many take their test before they are ready and as a result, may be convinced to have more lessons and practice before taking the test. Having a suitable incentive could also lead to a better use of money, time and resources for both candidates and examiners.

However, this will not deter all learners from 'having a go'. Some learners, paying for lessons and tests themselves, may find that a financial incentive makes them more likely to learn and practice more. But for others, who perhaps have lessons and tests paid for by family members, the test cost is not excessively prohibitive and having to pay for a second test does not represent a significant outlay.

They may well be prepared to risk losing their deposit in order to gain test experience and possibly pass.

Deciding the level of the financial incentive will be crucial to determining how effective it is. PACTS would like to have seen more information on what evidence already exists in support of the proposal and any existing or proposed trials and research into what level the incentive should be set at.

Care should also be taken to ensure that the incentive is not set at a level which sees the overall test fee rise excessively. Some candidates, even when well prepared for the test, fail due to events and conditions on the day; they should not be penalised by a test fee set to encourage greater pre-test practice.

The administrative costs of implementing and running the new scheme would also have to be taken into account.

6. What opportunities and risks would respondents see in alternative delivery models for aspects of the practical test?

PACTS Response:

PACTS sees no reason why 'alternative delivery models' should not be used for aspects of the practical test, so long as the same high-standards are maintained across the board and any concerns are fully addressed.

The potential opportunities include greater flexibility for when and where to take the test. Some candidates may find it easier to book a test slot at a time of day that suits them or is in a more convenient location. Other services like eye-tests could also be provided alongside driving tests.

Potential risks also exist. Examiners from the private sector and the tests would have to conform to the same standards as those conducted by the DVSA.

Candidates and their parents may also need reassurance that tests conducted by organisations and examiners from the private sector were as rigorous and of the same quality as those conducted by the DVSA.

The issue of universal or varying test fees would also need to be considered, as would monitoring of the test centres and examiners to ensure that they do not encourage 'teaching to the test'.

7. What factors are likely to attract potential partners to provide a practical driving test service?

PACTS Response:

The primary factor will be an opportunity to raise revenue. However, other factors could include the opportunity to provide a service (or another service), in a local area. Local companies may wish to partner with the DVSA to increase the number of test slots in a local area by conducting tests from an existing location.

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PACTS thanks the Department for Transport for the opportunity to respond to the current proposals.

PACTS
Clutha House
10 Storey's Gate
London
SW1P 3AY
www.pacts.org.uk
020 7222 7732
admin@pacts.org.uk