

Submission by Chartered Institute of Logistics and Transport in Ireland - Public Consultation Document

Proposals for the Reform of the Practical Driving Test in Ireland 2014

The objective of the CILT submission is to ensure that the driving test in Ireland continues to contribute to road safety by reducing fatalities and serious injuries on our roads and in keeping with the current RSA Road Safety Strategy. The submission can be broken into two sections, the first being specific comments on the recommendations in your proposal and secondly some more general comments regarding policy issues relating to driver testing.

COMMENTS ON THE RECOMMENDATIONS

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

Strongly agree with this recommendation: This would generally help to increase the number of hazards thus requiring the candidate to make more driving management decisions and display a greater level of sustained concentration.

Recommendation 2: Introduce independent driving into the practical tests

Strongly agree with this recommendation: This would require the candidate to think for themselves and be more proactive in reading the road ahead thus enhancing the ability to formulate a more achievable driving plan.

Recommendation 3: Include the assessment of eco-driving techniques in the practical test

Strongly agree with recommendation: **(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. It would encourage more progression, effective use of the gears (using the block changing method) and more controlled/tapered braking. In addition to helping to lower fuel consumption it would assist in delivering a more defensive drive as it is generally agreed that the two are inextricably linked

Disagree with recommendation **(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. I believe that feedback should include eco-driving techniques and should contribute to the overall result of the test

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

Strongly agree with this recommendation Assessment of hazard management can be achieved in: (1) normal driving during the course of normal driving during the driving test.

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

Agree with this recommendation: Would suggest retaining the oral part of the practical test to the end of the test.

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

Strongly disagree with this recommendation:

This part of the test should be moved to the end of the test and used as a check to understanding of particular issues that arise during the practical on road driving.

Recommendation 7: Driver Tester feedback after the driving test

Strongly agree with this recommendation as follows:

The introduction of the ADI to accompany the practical driving test and attend for the feedback session. (See also Recommendation 4). This system would also enhance the candidates understanding and interpretation of the feedback. It would also help to raise the ADI's awareness. Feedback should be more meaningful for the learner to understand the consequences of their actions or omissions.

Recommendation 8: HGV specific recommendations

None other than above.

ADDITIONAL COMMENTS - POLICY ISSUES RELATED TO DRIVER TESTING

There are two issues relevant to be considered in a review of the driving test that are not mentioned in the suggested list of review areas. They are

- efficient driving from perspective of impact on other road users
- the very significant difference in driving test pass rates from centre to centre.

Driving style impact on other road users

The suggestion of including environmental impact of driving style indicates a willingness to recognise that how we drive is not just a matter of being safe and in conformance with the law. The way we drive has other impacts, including environmental.

However, more significant is the impact that each driver can potentially have on other road users. Each driver can cause other road users extra expense, loss of time and environmental costs. The driving test should take account of how effective an individual driver is in how his/her driving style impacts on others.

The following are examples (there are many more) of impacts on other road users:

- Queuing in one lane at traffic lights when two are available, thus reducing the capacity of the junction. This can happen e.g. at the end of a bus lane
- Failure to use marked positions when waiting (with a green light) for a right turn. Marked positions are designed at some junctions to ensure that a right turning vehicle does not hold up the complete line of traffic which is continuing on straight
- Driving at too slow a speed when it is safe and legal to drive at or close to the speed limit, and when most other traffic following wishes to do so.

Driving test pass rates

RSA publishes the annual pass rate at each driving test centre. There is a large discrepancy between the pass rates, which vary from 41% to 69%. The difference is fairly consistent from year to year, and the same test centres are typically either at the lower or the higher end. There is also a tendency for urban centres to have lower pass rates and rural centres to have higher pass rates.

This needs to be investigated to establish why this is happening. Three possible reasons would be:

1. Drivers are better prepared
2. Test course is less demanding
3. Drivers testers are more lenient in marking

Regarding reason 1 it would be somewhat difficult to accept that drivers in certain test centres are much better prepared than in others on such a consistent basis. Therefore there have to be other reasons, which likely include points 2 and 3 above. If this is the case, then it needs to be addressed.

It is important that standards of driving expected of candidates are consistent throughout the country. The variation in pass rates would suggest that this is not the case. An appropriate and impartial investigation of this is necessary.

