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New Zealand
Automobile
Association



Driver Licensing Amendment Rule

NZAA submission

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LAND TRANSPORT (DRIVER LICENSING) AMENDMENT RULE 2014

Introduction

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the Driver Licence Amendment Rule. The AA appreciates the extension to 6 June to obtain feedback from its 17 Districts to amend our draft submission. This submission replaces the earlier 28 May draft version.

The AA is an incorporated society with over 1.4 million Members. The AA's advocacy and policy work mainly focuses on enhancing the safety of all road users, keeping the cost of motoring fair and reasonable, and protecting the freedom of choice and rights of motorists.

The driver licence system touches the lives of millions of New Zealanders and changes have significant ramifications. Ideally there would be adequate time to consult and survey our Members on this issue, so while we acknowledge the extension of a week for such an important issue the time frames have been quite short.

Both the AA's commercial and advocacy sides are potentially affected by this Driver Licensing Rule. This submission is from the perspective of the public good advocacy side, and all errors and omissions are ours, but AA Driver Licensing and AA Driving School support the general principles outlined below.

Time limits on Learner or Restricted Car or Motorcycle Licences

The AA agrees that pooling on the GDLS is an issue that is leading to undesirable consequences; undermines credibility of the driver licence system, creates issues for Police enforcement and insurance issues for people who are not actually high risk; reduces prospects for employment and social participation; and reduces the pool of people eligible for subsequent vocational driving licences (eg Passenger Service, heavy vehicle, instructor).

The AA considers that taking a customer view, of supporting the majority of well meaning public to complete the GDLS, will result in greater reduction in pooling than a punitive approach. An approach based on deterrence may feel satisfying, but is essentially ineffective and risks serious unintended consequences. The AA also considers that a primary focus, particularly when adding costs to the GDLS, should be on adding skills or experience to make their driving safer.

Proposal T1: A five-year time limit for a learner or restricted car or motorcycle licence

The AA supports:

- a five year time limit for Learner (L) and Restricted (R) car and motorcycle licences
- the transitional arrangement to exempt the expiry dates of current L and R licences
- that other vocational licences (heavy vehicle learner licence) are not affected.

A shorter time limit will provide a reminder to progress, and a greater sense of urgency.

Proposal T2: Require holders of a learner or restricted car or motorcycle licence who have not progressed to the next licence stage to pass a theory test before they can renew their licence

The AA opposes forcing L and R Class 1 or 6) car or motorcycle licence holders to pass a theory test. There is no evidence of any road safety benefit from repeating knowledge of the road code. A punitive deterrence approach is not only ineffective, it adds cost without benefit and creates other more serious unintended consequences. We note that theory tests have to be carried out in person at an agent's and in some cases involve considerable travel as well as the cost of the test itself. We discuss the Class 1 (Car) and Class 6 (Motorcycle) licences separately below as these cover two quite different risk profiles.

Time Limits: L Car Licence:

The AA supports moving from 10 year to five year renewal period. The shorter renewal period acts as both a reminder as an added cost which gives an incentive to progress.

The AA opposes the requirement to repeat the theory test. This is essentially a 'make work' component to the proposal that would be difficult to justify from a compliance cost vs benefit perspective, as it adds little to road safety or progression. The AA proposes some alternatives below.

In an unrepresentative poll of some young Learner drivers, half unprompted mentioned the added cost as an issue for the five year period and the re-sitting theory test would be a major cost component. A comment from a District:

"it may well cause aggression towards agents when customers are told they will have to re-sit the theory test as they will feel they have already paid and successfully passed this at a prior date and will see this as another "money making scheme from the government".

The AA opposes forcing progression from the (safest) L car licence to the (riskiest) R licence.

District feedback (particularly from more deprived areas) suggests that the L licence is the cheapest form of identity document, and that many people hold an L licence simply as ID with no intention to learn to drive. Others gain an L licence and comply with the conditions but have no need to progress at the time (no access to a car, using public transport etc). At the age range in question, many people are in changing circumstances (leaving home, travelling, living in hostels, low income jobs) and may have less access to opportunities to learn to drive, less need to drive, or less funds available than expected.

Provided a young person is complying with the stringent conditions of the L licence when they drive, or is not driving at all, there does not seem to be a case for forcing them to progress, simply to avoid the pooling for its own sake.

Encouragement to progress

For those who do want to progress, and particularly for those who have infringements for driving outside the conditions of the L licence by the five year renewal, the AA supports NZTA considering options to encourage them to progress to an R licence.

Ways that both encourage Learners to progress (and improve their driving knowledge or skill) include:

- getting them to complete:
 - a specifically designed **online skill check** (eg e-Drive)
 - **a short in-car evaluation** (I am not sure about the other approved course but the AA's Defensive Driving Course includes both supervised completion of e-Drive and an in-car evaluation of their key risk profile)
 - the (excellent) **Practice programme** (would need if some way of tracking completion)
 - **a session (or sessions) with a driving instructor** who can run them through the test requirements and advise the skills they need to practice to meet R test standards
- establishing a nationwide programme to assist disadvantaged young drivers obtain sufficient supervised practice to raise their skills to meet the R test requirements
- introducing supervised driving practice as a subject at high schools or vocational education facilities, so that all New Zealanders start from the same basis of access to a driver licence (and the wider employment opportunities that provides).

Other more administrative options to encourage progression include:

- **setting up group test booking** programmes to assist novice drivers collect the requirements to sit the test (correct documentation, warranted vehicle and transport, and even possibly a layby scheme for the testing fees and eye test if needed)
- getting them more comfortable with the test by **sending a clear outline of what the test entails**, what the tester will be looking for, what skills they need to practice and most common reasons for failing (including lateness and vehicle faults)
- including in the renewal notice a **clear simple visual of the financial advantage** of sitting the R test instead of renewing the L licence (ie not having both renewal and licence upgrade costs)
- offering a **one-off limited time discount** in the months prior to the five year renewal
- enabling **vocational (or student loan) funding to obtain the Class 1 licence**, which currently only apply for subsequent licence Classes (heavy vehicle or passenger service)
- **Police or Court ordered diversion programmes** for those caught driving outside their licence conditions, and a deadline for licence progression.

While research mentions cost as an issue, what people will not share is that the risk of failure is a psychological barrier to sitting the R test. A professional lesson or two can bolster their willingness to sit the test. An instructor can help Learner drivers more accurately assess whether they have reached the required skill levels, and what to practice, and also provide a clear idea of what the testing officer will be looking for.

Advance notice of expiry

If L licence holders are required to complete a course or sit a test (particularly a practical test), **the AA strongly recommends NZTA should give substantive advance warning** (eg 3 months), to enable test preparation and potential test booking waiting lists. As an alternative,

increasing driving safety should be the focus. Otherwise a one month renewal notice would be sufficient. As noted in the Evidence of Identity section, NZTA should also collect other forms of contact details to assist with driver licence expiry notification.

Identity document

For those who do not want to progress because they hold the driver licence as an identity document only, some other identity card option needs to be provided, as the driver licence is intended primarily to be a driver licence, not an identity card. Once the driver licence meets the EOI standards for an identity document, NZTA might raise this with Internal Affairs.

NZTA should also consider that there is a need for an identity document (prior to being sent their photo driver licence) to verify the correct person is being tested for eye tests, and sometimes medical or other tests, as well as sitting the theory test. Is it possible for someone to stand in for a friend at an optometrist or doctor's office?

An identity document would also be useful for those who have misplaced (lost or had stolen) their licence, or people who have been disqualified from driving and hence NZTA has destroyed their driver licence. Otherwise these groups need to prove their identity all over again to relicence.

Pre licence process

NZTA could consider a two-step process to obtain the first licence:

- first step (eg online) during the booking procedure to go over exactly what the applicant proposes to bring as evidence of identity and other requirements
- second step: sit the driver licence test in the centre.

This could simplify and reduce customer frustration at driving licence applications, where customers do not bring the right evidence of identity, particularly where time is tight or they have travelled some distance. Sitting the test is stressful enough (particularly for young people and those with English as a second language such as immigrants).

Time limits: R Car (Class 1) Licence

The AA strongly opposes forcing holders of an R licence to resit the theory test as it provides no road safety benefit and is not a regulatory setting that leads to greater compliance with the driver licence system. It neither encourages/supports progression nor leads to improved skills/training.

Further, it actively risks undermining the driver licence system and road safety. If a holder of an R licence who has been driving for five years fails the theory test, it is highly unlikely they will stop driving, particularly if their life now requires it (eg for work, young family or other commitments).

The AA strongly opposes any period where GDLS participants become unlicensed.

Building in any period at all to be unlicensed carries a strong risk of backfiring. Evidence shows that far from being a salutary lesson, the majority of unlicensed drivers continue to drive and learn quite quickly that unlicensed driving is highly unlikely to be detected. Police confirm that unlicensed driving is difficult to enforce, with unlicensed drivers a veritable needle in a haystack. Having learnt there is little consequence for licensure, the proposal then risks these drivers deciding it is much easier to stay outside the driver licence system.

Once driving unlicensed there is greater incentive to flee Police, with all the serious risks this entails to themselves and innocent parties. It also affects other social outcomes such as employability and social norms around complying with the law.

The AA supports automatic progression to a Full licence when the Restricted licence expires, but considers this period too long for the restrictions. The difference between a Restricted (R) and a Full (F) licence is basically two conditions: driving at night and driving with passengers¹. The rationale for these conditions is to give the novice driver on-road solo driving experience under less risky conditions.

Evidence suggests after three years of solo driving, there is no significant difference in risk between someone holding an R licence and an F licence. The AA considers that allowing these licence conditions to lapse after a period would have little effect on risk, but greatly affect pooling numbers. The AA considers five years may be too long to comply with the restrictions, and that a shorter period (in the order of 18 months to three years) could be an appropriate length for restrictions to have the majority compliant. The restriction period should still be able to be shortened to a year as currently for those who complete an approved course, as there is sometimes urgency to complete faster (eg for employment requirements).

Some Australian states for example, have only one on-road test and automatic progression from P1 to P2 to Full licences. In effect in New Zealand this would mean that the R test becomes the only test, and as restrictions come off automatically they would upgrade to a F licence.

The AA would prefer that automatic progression to a F licence was conditional on having no demerit points on the R licence ie could only occur after demerits had expired. This would increase incentive for novice drivers to drive compliantly during their highest risk period. A person with demerits who required a Full licence could still progress by passing the Full test.

The AA's second position would be to support making the Full licence test simpler (more of a formality), and being **compulsory to attempt a Full licence test prior to R renewal**. This forces additional on-road preparation and practice for the tests. If they pass they can then be issued with the next level licence; if they fail this reduces confidence at a risky point in licensure and encourages learning the skills they failed. This would result in a rapid decrease in pooling (increasing the credibility of the licence system), and reduces (rather than duplicates) overall GDLS costs. A caveat is that to qualify, the testing office should verify that the person attended the Full test in person to avoid 'no shows'.

Failing that, **the AA supports NZTA considering alternatives** (to a theory test) that would more effectively increase safety skills and actively support licence progression. These include:

- completing an approved course (eg specifically designed for the purpose)
- participating in professional driving lessons
- attempting a Full licence test (pass receive Full licence fail renews R licence).

Time Limits: L and R Class 6 Motorcycle Licences

Motorcycle and car GDLS issues are very different and should not be treated the same. Learner car drivers are the safest group on the road because the licence requires they are supervised; they have very low exposure. By contrast Restricted car drivers have the highest crash risk of any drivers, particularly in the first 6-9 months, which is why restrictions are placed on them to enable them to gain solo experience in more controlled conditions.

By contrast, Learner motorcycle riders are able to ride on the road solo under almost identical conditions to those of a Restricted motorcycle rider, because it is impractical to require a "supervising rider. L riders are only required to pass a cursory riding skills test before riding solo on the road. L riders are immediately at high risk (indeed higher risk than car R licence holders)

¹ Plus if someone gains a R licence in an automatic vehicle, a restriction on driving a manual vehicle.

and should hence be treated much more like the Class 1 R licence. The AA's different responses to the motorcycle and car reflect these very different risk profiles and GDLS paths.

The AA supports requiring L and R motorcycle licence holders to sit their next level motorcycle practical test before they can renew, or relinquish their L motorcycle licence.

As noted above, sitting practical tests requires preparation; if they pass, they progress to the next level licence enhancing the credibility of the GDLS; if they fail it reduces confidence hence increases safety and encourages learning the skills they failed. This would reduce pooling and reduce overall costs.

Alternatives that the AA would support as secondary options to increase the standard of riding including:

- completing an approved course (eg specifically designed for the purpose) eg basic safety
- participating in professional rider training.

The AA notes that there is very little difference between the L and R motorcycle licences², hence little incentive to progress from L to R unless they plan to replace their motorcycle with a more powerful model. The AA questions whether there needs to be three levels to the motorcycle GDLS, or whether the Learner phase is already effectively equivalent to the Restricted level of the car licence. **The AA recommends NZTA investigate whether the motorcycle GDLS could be made two steps instead of three, or of providing greater incentive to progress from L to R to F.**

A District comment:

Why not have a rider on a provisional licence (passing basic handling, theory and ride ability) for 12 months and then test for a Full licence?

Historical L Motorcycle Licences

For historical reasons on transfer to the photo driver licence, there are a cohort of people with both a Full car licence and an unused L or R motorcycle licence. There is a potential safety downside of forcing progression on the motorcycle licence, so the decision needs to be carefully weighed as to whether to force progression or relinquish the L Class 6 will result in safety benefits or disbenefits. There is a benefit in **providing an incentive to remove the ability to ride solo after possibly decades of not using the L motorcycle licence.** At the very least, for people holding an unused L or R motorcycle licence, **the AA recommends the renewal notice provide a simple, clear explanation of the benefit of reverting to just a Full car licence** (costs of 10 year renewal instead of five year renewal).

Proposal T3: Allow a learner or restricted car or motorcycle licence to be renewed only when the licence has expired.

The AA strongly opposes forcing a period of unlicensed driving. As already noted above, while this may be a mild disincentive, international research indicates on the vast majority of unlicensed drink drivers, for example, continue to drive and further, learn that driving unlicensed is very difficult to detect. This will undermine rather than support compliance with the driver licence system, potentially increase Police pursuits and undermine other social outcomes (employment etc).

Proposal T4: Apply the new five-year time limit to holders of a learner or restricted car or motorcycle licence who reinstate their licence, and clarify the new expiry dates that would apply when someone reinstates their licence following a sanction.

² In the L phase a rider has to display L plates, but no plates in the R phase.

The AA supports consistent time limits for licence reinstatements as for licences.

Proposal T5: Apply the new five-year time limit to holders of a learner or restricted car or motorcycle licence who reinstate their licence when there is no zero alcohol licence in force

The AA supports consistent time limits for licence reinstatements as for licences.

Flexible transactions

Proposal F1: Amend the rule to enable some driver licensing transactions to be completed without having to go to a driver licensing agent in person (for example online or via kiosks).

The AA supports making transactions more convenient and cheaper for motorists but requires this to be balanced against road safety. Remote transactions have the potential to increase the risk of fraud. Checks and balances are required to ensure remote driver licensing does not enable people to drive on the road who are not safe to drive, such as biometric evidence (eg facial recognition software). There needs to be protection to ensure the correct identity has completed medical and eye examinations for remote transactions.

Evidence of identity

The AA is concerned that the proposals put forward are in the context of the driver licence as an identity document, rather than its two fundamental roles:

- proof that a person has passed various tests to entitle them to various levels of driving on public roads, and
- to enforce or sanction their safe driving behaviour.

It is critical that the correct person is being tested, and this applies for theory, practical, medical, and eyesight tests and addiction assessments, and their identity should be proven at each step in the chain not just for test bookings.

For the integrity of the road safety enforcement and penalty regime, it is also important that a person can be contacted for posted infringements, demerits and loss of licence.

In the poll, most preferred to be contacted by email, followed by mobile phone, before post.

The AA strongly recommends that NZTA reconsider the proposals with these two driver licence functions in mind to ensure that they do not compromise road safety and integrity of the enforcement and GDLS systems.

The proposals also assume the public has a clear understanding of the purpose of providing their address and their legal requirements. An indicative poll of a small number of Learner licence holders indicates that the majority are not aware that driver licences expire, and the address they give as evidence of address will be used to remind them to renew. They were also not aware that they are legally required to advise the Driver Licence Register if they change address (or the penalties for not doing so).

This indicates a serious communication issue exists around the driver licence register. While linking to the motor vehicle register has improved its quality, there is still a long way to go. Postal addresses, while outdated, are all that NZTA collects, but are no longer the most long-lived contact method.

The AA strongly recommends that before removing evidence of postal address, that NZTA collect email and mobile phone contact information in addition to postal address.

The AA strongly recommends that NZTA actively promote and facilitate the requirement to notify change of address. For example, NZTA Motor Vehicle and Driver Licence registers should be included prominently in NZ Post change of address forms.

Proposal E1: Distinguish the requirements to prove identity for first obtaining a driver licence from those applying to subsequent applications.

The AA supports this proposal, to reduce compliance costs and improve convenience, with the exclusion of the R and F practical tests. The driver licence is not simply an identity document, as noted above, but needs to be produced to demonstrate that the person is eligible to sit the next level of test, for example. Further, because of the risk of fraud, there must be adequate checks and balances, and introducing biometric data accessible to the counter staff would be supported.

Proposal E2: Provide an updated list of identity documents that must be presented for a first application for a driver licence.

The AA supports moving the driver licence to a higher standard for EOI, however this should not compromise its primary function as evidence of passing driving tests and tool for enforcing driving penalties.

Evidence of Address

Despite evidence of address being an issue for some driver licence applicants, the AA opposes the removal of evidence of address, on the basis that the address is a critical part of the road safety penalty system. A person can be posted their licence to somewhere they are living for two weeks, and most are unaware of the requirement to advise a change in address. As noted above, the driver licence is not simply an ID, it also is part of a road safety system. Driver Licence Register is also used for contacting drivers about renewals. NZTA should consider the full impact of address on the driver penalty system and driver licence renewals before proceeding with removing postal address requirements.

The AA also considers that the current passive approach to educating drivers about their obligation to update addresses is inadequate and certainly not customer focused. Simple processes to remind and assist in updating NZTA of contact details at the time of changing address are also lacking.

The AA opposes removing the requirement for evidence of postal address until NZTA:

- collects alternative (electronic) contact details (email, mobile phone etc)
- introduces their use in the traffic infringement system
- introduces their use to advise of licence expiry
- simplifies how to update contact details.

In the meantime the AA recommends that NZTA actively promotes:

- the requirement to advise change of contact details including address
- the benefit of advising address (that driver licence renewals are posted to the address on the system).

When someone comes in to the agent to update their licence frequently (which can occur for endorsements for example), it would assist if the Evidence of Address could be carried over within say the last 60 days and not have to be proven again.

Proposal E3: Require photographic evidence of identity as part of a first application for a driver licence.

The AA supports moving the driver licence to a higher standard for EOI.

This will benefit the public in a number of ways, including making it easier to carry a portable identity document, reducing potential fraudulent driver licensing and hence improving road safety, and gaining credibility in the driver licence system.

The majority of people use birth certificates as evidence of identity, and this change will have the greatest effect on this group. They are unlikely to be happy with the increased requirement, particularly as most applicants are youth who may have recently moved away from home and could find it difficult to find people who know them to sign their photo. Various suggestions including the heads of educational institutions, student photo ID cards were put forward to address this. Without coming to any conclusion, we simply put this forward as an issue that may create frustration and reduce access to the driver licence system.

District Comment:

“Cost is a major issue for some people...it doesn’t feel right to tell a 77yr old customer that they have to purchase a new birth certificate.”

“Giving people more options of documents they can use for proof of identity would make it a lot easier for motorists to get or renew their licence”

However, we note feedback from counter staff that there are currently issues of aggressive or threatening behaviour surrounding the EOI requirement, despite clearly worded application forms. There is no requirement to speak English to obtain a NZ driver licence and some applicants have a below average reading levels. The AA recommends that NZTA assess its forms, and website advice for reading comprehension levels and consider its processes. In particular, it would reduce conflict if people arrive for their test booking clear on what they need to bring to driver licence applications, to reduce frustration, repeat trips and delays in licensure for customers (which may cost them a job). A system for having someone pre-vet their evidence before they travel to the centre, for example, would reduce a lot of frustration.

If people do not have a passport, the evidence of identity is a fraught transaction. The birth certificate plus a verified photo is generally supported, but agents consider if someone presents photo ID (eg 18+ card) alongside the birth certificate, people will not understand why this could not be used as the photographic evidence and will get upset. Is it possible to use other photo ID instead of the signed photo as proof that the identity is linked to the birth certificate? When counter staff have known the applicant for many years, evidence of identity requirements can seem frustratingly obtuse.

District comments:

“Staff experience a lot of abuse from all ages for not being customer friendly where ID is concerned.”

“Could AA managers be approved to verify primary ID?”

Marriage and Divorce Documents

Agents advise that the process can be particularly difficult for women who have may have married and divorced several times. A recurring theme is that after an acrimonious divorce the marriage document is destroyed. There can be several marriages, divorces and subsequent changes of name. This leads to an inequitable issue for women, whereby they have to obtain a series of documents to link to the birth certificate, all adding to the cost.

District Comment:

“Could a drop down box be introduced with names that the customer has used before stating maiden name or previous names, as sometimes a customer has changed names more than once and following the link to the name they now wish to use causes significant frustration”.

Another issue that our Districts have raised is where an applicant is not NZ born, and has an expired passport. This occurs with young people who moved as children to NZ from overseas, or immigrants whose Certificate of Identity has expired.

District comment: *The language barrier is often difficult, is there a simpler way of handling evidence of identity for these customers?*

Currently counter staff can see the person applying for a renewal but not the photo, while NZTA staff can see the photo but not the person. This is not ideal, eg for verifying identity for renewals. Agents often see people who do not look like the photo on their driver licence. While people can change appearance over time, there is also the risk of fraudulent use. If agents were able to access photo and signature information, this would improve confidence that the person standing in front of them is the correct identity.

District comment:

“It would be helpful, and could reduce fraud, if Agents were able to ask NZTA or Police to email through the photo records, so we can verify someone in certain circumstances.”

For those requiring medical certificates of fitness to drive, there is another issue of customer frustration because the driver licensing agent cannot access the NZTA information as to when the medical certificate will expire, and the customer has to be directed to call the Transport Registry Centre.

District comment: *“Customers get frustrated at being told they have to NZTA to verify the medical certificate expiry dates; they do not understand the difference between the agent and NZTA.”*

A major transaction for centres are overseas licence conversions, however centres have no ability to check whether the overseas licence being presented is valid. At one centre, a driver acknowledged that he was indefinitely disqualified for drink driving, but had obtained a second copy of his licence.

District comment: *It doesn't feel right to issue a licence to someone likely to be a danger on the road. Is there any way to validate licences at an international level, if there are suspicious circumstances?*

Proposal E4: Allow the presentation of a New Zealand photographic driver licence as sufficient evidence of identity for subsequent in person applications.

The AA supports this proposal. Once the driver licence has reached the EOI standard it should be sufficient to prove identity for in person transactions. The AA opposes the use of this for remote transactions without other biometric information.

Proposal E5: Set identity requirements for (future) online transactions.

The AA supports enabling online transactions for the future, to reduce cost and increase convenience. However this must be balanced against the integrity of the driver licence system. The AA opposes the use of remote transactions without biometric information.

Other minor consequential amendments

Proposal O1: Replace references to the Transport Services Licensing Act 1989 (now repealed), with references to current legislation.

The AA supports this administrative proposal.

Other Comments on the draft Rule

As a complementary or alternative way to encourage licence progression **the AA supports the introduction of compulsory R plates**, which are only a few dollars (eg \$2 shop). The plates should include the licence restrictions printed on the inward side so that others (parents, passengers) can know and assist with compliance with conditions.

The AA also supports renaming the Learner licence as a permit (to practice with supervision) as the supervising driver is technically in charge of the vehicle. This will reinforce that it is not a licence to drive solo and reduce confusion with international jurisdictions who have a similar pre-licence phase.

The AA considers that the offence of driving unsupervised on a Learner licence should not just be driving in breach of licence conditions, it should be treated as seriously as driving unlicensed, which it is more comparable to.

Yours sincerely

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