



Driver Licensing Amendment Rule (No2) 2021 Submission





Submission

Proposal to amend the Driver Licensing Rule and revoke the time-limited licence policy

The Driving Change Network and its members object to the proposed amendment to the Driver Licensing Rule to revoke the time limited licence policy and revert to 10 year expiry periods and disagree in particular to the stated rationale behind this change.

Legislated changes should serve the public good of Aotearoa and be made for the right reasons. The 2014 amendment rule was a policy failure that is due to impact the lives of 144,000 people, but quickly legislating another change without addressing the systemic issues is not the solution our network want to see.

We want a system that is equitable for everyone in New Zealand. This must ensure that equity of access and opportunity for whānau Māori addresses rights under the Treaty of Waitangi.

We want to see the New Zealand government address the deeper issues in the system, and believe the regulatory review proposed in the Road to Zero Action Plan needs to take place before any isolated legislated changes are made, including this one.

While we agree with the Waka Kotahi proposal to remove the 90-day time restriction on renewal, we strongly disagree with the changing of expiry periods in this current legislation and suggest instead one further extension of two years.

The 2014 Amendment Rule was implemented in 2014 aimed to alleviate the perceived issue known as 'pooling'. The reduction to a five year expiry was to encourage progression through the driver licensing system.

The Waka Kotahi's proposal for legislative change has outlined several barriers to progression through the graduated licensing system. Additionally, we have also found the following barriers to be of concern;

- language or literacy difficulties
- anxieties or mental health well-being
- access to a practical testing sites

Without addressing these barriers alongside the barriers outlined in the consultation document many users of the current system are incapable of progressing through the GDLS without support, including young people at risk of poor employment or training outcomes.

Further "work to reduce the main barriers to gaining a driver licence, including cost, access to training, and access to testing services" (Road-to-Zero-Action-Plan, 2019, p.34) is critical to road safety outcomes and needs to be progressed further before any legislative changes are made.

We therefore disagree with the rationale backing the changes to this rule and feel that rather than having numerous public benefits, it will have a negative effect and may even result in a continued growth in the number of users who do not progress to full licence.

Improves access and mobility:

We can see no evidence of how this change will improve access and mobility.

Access and mobility is defined as the ability for people to get around. The length a user can remain on their learner or restricted licence for has no relation to this.



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Assists economic development:

The consultation document states that having a learner or restricted licence can be a requirement for employment and therefore this will assist these licence holders.

The 2016 Auckland Co-Design Lab, Case for Change study found that 70% of advertised jobs have a full licence as a prerequisite for employment. 2018 census figures from the IDI database show that 80.6% of the Full-time employed labour market hold a Full NZ Drivers licence compared to just 4.7% on a Learners Licence*. The research shows that there is a stronger correlation between holding a full licence and having full-time employment.

Further to this, the restrictions of a learners or restricted licence, by way of being unable to drive unsupervised or restricted hours permitted to drive, limits the type and role of employment that users are able to be engaged in, particularly if they are reliant on this form of transport to get to work.

Protects and Promotes Public Health:

The 2014 amendment aimed to improve road safety by encouraging users to progress through the GDLS. The graduated driver licensing system is designed to provide you with the skills and experience to become a safer driver on New Zealand roads. Each test is designed to assess your ability to apply your knowledge of road rules and safe driving practices.**

Further to this, Ministry of Transport statistics and insights data shows that two of the top causes contributing to crashes are Alcohol/Drugs and speeding. The drivers responsible can be broken down as;

- Alcohol/Drugs , 68% disqualified drivers, 52% Learner drivers, 39% Restricted drivers.
- Speeding, 39% caused by disqualified drivers, 32% Learners and 28% Restricted.

Those most at risk of not progressing and holding a full licence are often from lower income families.

Without a licence employment opportunities are fewer, perpetuating a cycle of inequality. These people risk social and economic isolation, or if they choose to drive unlicensed or outside their licence conditions, can face fines and often a journey into the judicial system. All of this detrimentally impacts the users' financial status and well being.

Current Regulatory Review of the Licensing System

In a recent Ministry of Transport presentation at the Driving Change Network National Hui detailing the work currently being undertaken as part of the Regulatory Review of the Licensing System (as named as a priority action in Road to Zero action plan for 2020-2022) it was stated that an effective graduated driver licensing system helps to reduce the risk of death and injuries on our roads. However, many people currently face barriers to entering and progressing through the system. We were advised that one of the factors being considered was how to achieve improved safety while balancing access and equity issues and how to ensure the testing regime is equitable, accessible and fit for purpose.

This GDLS Regulatory review is being undertaken at the same time as the MSD led access to driver licensing review, with findings being due at the end of 2021. Both pieces of work have the potential to address many of the above barriers that contribute to the licence pooling issue and should be completed before legislative changes are made in isolation.

*Source: This file was generated by Drivr2_centabs_noagematch_sp.do.

Disclaimer: Access to the data used in this study was provided by Stats NZ under conditions designed to give effect to the security and confidentiality provisions of the Statistics Act 1975. The results presented in this study are the work of the author, not Stats NZ or individual data suppliers.

** NZTA Fact Sheet45



Conclusion

While we support the proposal to remove the 90-day time restriction on renewal, which will remove the time barriers that exist in some regions when attempting to book tests, we strongly disagree with the changing of this current legislation with regard to licence expiry dates and would suggest one further extension.

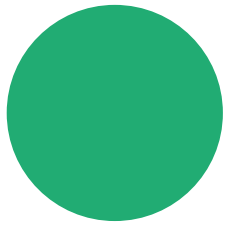
Revoking the Land Transport (Driver Licensing) Amendment Rule 2014 will do nothing to address the systemic issues that have led to 144,000 New Zealand licence holders not progressing through the GDL system.

This move will alleviate the pressure the 100,000 plus expiring licences would cause and ensure that counter based testing services remain manageable, but it is merely a bandaid to address the failures of successive governments since 2014 who have not addressed the causes of this non-progression.

The Driving Change Network and its members recommend that **No changes be made** to the current legislation until the GDLS Regulatory review, and the MSD led access to driver licensing review have both been concluded.

We believe it is critical that systemic changes be made to the Driver Licensing system, incorporating steps to assist users to overcome the barriers that have led to the 144,000 pooled licences, thus enabling our system to be equitable and accessible to everyone in Aotearoa New Zealand.

Until this can happen, we feel a further two year extension should be put in place along with a clear communication and education strategy to those who are affected, detailing what they need to do and who to approach for assistance in order to progress their Learners or Restricted licences before the 2023 expiry.



WHO WE ARE

Calling for an equitable GDLS system that focuses on education, training and licensing that everyone are able to access

The Driving Change Network is the result of significant philanthropic investment into driver education, training and licensing in our communities.

We were formed in 2019, when **Todd Foundation, JR McKenzie Trust, Vodafone New Zealand Foundation** and the **Mayors Taskforce for Jobs** decided to pivot from funding driver programmes to funding the Driving Change Network. We want to work with government to fix the systemic issues that were creating the need for funded driving education training and licensing programmes.

This required a pivot from funding driver education, training and licensing programmes. By funding the Driving Change Network instead we hope to work with government to address the systemic changes required to create an equitable and accessible driver licensing system.

The Driving Change Network has grown into a diverse group of more than 200 Stakeholders representing the community, industry, Iwi/Māori and philanthropy sectors who support driver education, training and licensing.

We want to work with Government to establish a Graduated Driver License System (GDLS) which includes a focus on driver education, training and licensing.



