



Road to Zero 2020-2030 Road Safety Strategy Submission

Vodafone New Zealand Foundation, Todd Foundation, and the Mayor's Taskforce for Jobs Submission

We are 'Driving Change' a collaborative looking at systems change in driver licensing in Aotearoa.

Our group was formed in late 2018 after bringing together a small group of community focussed funders to look at the barriers young people face to getting their driver's licenses. "We noticed a trend in our funding

applications, with more and more localised driver licensing programmes and community driving schools seeking our funding. Communities around the country were identifying the same need for their communities and rangatahi – a need for access to education, mentors and resources for their young people to obtain driver licenses.” Driving Change has since grown to include a wide range of stakeholders in the driver licensing space beyond philanthropy.

Driving Change’s ‘Hawaiiki Hou’, or destination on the horizon, is *a driver licensing system in New Zealand where a driver’s license is recognised for the social good it provides beyond a licence to drive*. We believe all New Zealanders deserve access to the benefits of a driver’s licence.

We want to see:

- New Zealand role modelling the best driver licensing system in the world
- Equity in access to driver licensing in Aotearoa
- A system where a driver’s licence is recognised as a social good, not a private good only accessible to those who are better positioned to afford it
- An adaptive system which can easily navigate innovative and changing technologies
- More collaboration and systems thinking in the driver licensing system
- Young people who understand what having a driver’s license unlocks, where to go to learn, and who are clear on the steps it will take to get a licence
- An effectively resourced driver licensing education system
- Safer roads with fewer road deaths and less accidents

We believe only a systems thinking approach, working in collaboration with key cross-sector stakeholders is likely to achieve a well-functioning and more accessible driver licensing system.

The Vodafone New Zealand Foundation has a vision – to see all young people in Aotearoa, New Zealand living lives they value. With their energy and creativity, together with the right support, young people can achieve truly amazing things. The Vodafone Foundation has been giving globally since 1991 and the New Zealand Foundation is one of 27 Vodafone Foundations around the world. In New Zealand, we’ve been working since 2002, and focused on youth development since 2007. Over that time, we’ve invested more than \$25 million in local communities, primarily through our World of Difference programmes. We are dedicated to creating a thriving and prosperous Aotearoa New Zealand, where all young people can live lives they value. According to Treasury New Zealand, there are 210,000 children and young people who don’t have access to the resources and support they need to grow into the great adults they want to be. We want to change that.

The Todd Foundation is a philanthropic family foundation providing funding and support to organisations in Aotearoa NZ that add to our vision of ‘An inclusive Aotearoa New Zealand where all families, children and young people can thrive and contribute’. We are working collectively to respond to systemic challenges in NZ by resourcing long-term social change initiatives. Since our inception in 1972 we have contributed over \$82 million to community initiatives in Aotearoa NZ.

The Mayors Taskforce for Jobs (MTFJ) is a nationwide network of 65 out of the 67 Mayors in New Zealand all striving towards the vision of zero youth unemployment. MTFJ was established in 2000 and is now one of New Zealand’s most powerful advocacy groups. MTFJ recognises the need to act more strategically and effectively on the issues of youth unemployment and focuses on long-term strategies to create meaningful change. MTFJ is governed by a Core Group of 17 Mayors and is chaired by Mayor Max Baxter of Otorohanga District Council. The MTFJ Core Group meet quarterly in Wellington with Ministers and officials from Government departments and hold the responsibility for the overall strategic direction of the Taskforce.

Summary of Submission

The Road to Zero Road Safety Strategy in its current form does not have a strong enough focus on driver licensing or driver education.

We believe a road safety strategy is incomplete without a strong plan around the licensing and education of its users. User error plays a critical role in road accidents. From unlicensed drivers to disqualified drivers, we believe that driver education starts well before the Graduated Driver Licensing System (GDLS), and continues well into regular road use behaviour. We believe access to, and inversely, barriers to obtaining a licence have to be considered in this strategy. Not only is more equitable access to licensing going to contribute to road safety, but increased access will lead to fiscal savings and a range of other social benefits (see the 2016 NZIER report to MBIE).

A driver's licence in Aotearoa serves as much more than a licence to drive, and the current system is not working, particularly for Māori, young people, those in rural New Zealand, and those facing poverty. A driver licence is often a requirement for jobs that don't even include driving. For many young people this is their only valid form of photo id, and their first qualification. Rural young people are being particularly hard hit by the financial barrier of both the licensing process and the distance they need to travel to sit a license, usually on more than one occasion. Additionally, statistics are showing that there are growing numbers of young people driving without licenses, being ticketed by the Police, and in some cases incarcerated due to an inability to pay their fine.

We do not have a neatly packaged solution to the driver licensing challenge. But we believe a systems thinking approach, working in collaboration with key cross-sector stakeholders is likely to achieve a well-functioning and more accessible driver licensing system.

Our key recommendations are:

1. Driver licensing and education must be a focus area in its own right, or a stronger component of focus area four.
2. A government action plan must be established to address transport disadvantage and improve access to driver licensing.
3. Review the 2014 policy to put a five year lifetime on learners and restricted licences. On December 1st 2019 the first batch of licences will expire; we've heard that 20,000 - 63,000 licenced drivers will become unlicensed and approximately 5,000 more every month following. Immediate action is needed to avoid an enormous increase in unlicensed drivers on our roads..
4. Increase the subsidised five hours of professional driving lessons for young people on youth benefits to 40 hours. Five hours of lessons is not enough to achieve any significant outcomes compared to the 120 hours of practise recommended by the NZTA, or the 40 hours suggested by the community driving instructors we have spoken to.
5. Establish a single agency/cross-agency group tasked with improving driver education in partnership with community stakeholders. Government and community initiatives need clear government leadership and sustainable funding to make a real difference.
6. Research should be conducted to understand the variety of barriers to obtaining a learner licence and progressing through the GDLS, how they might be related, who is facing them and what is required to overcome them.
7. Review the system, and in particular the resource flow around community driver education and licensing in New Zealand.
8. Clarify how the 'Road to Zero' strategy relates to and interacts with other relevant government policies and strategies.

9. Amend principle five to include a clearer commitment to the inclusion of local qualitative data.
10. Invite the key stakeholders in the community to the leadership table. If road safety is everyone's responsibility, a wider cross-section of stakeholders should be invited to the system management table.

Invitation

We'd like to take this opportunity to invite those considering these submissions to engage with our group further. We are holding a cross-sector hui on the 3rd September 2019 to look at Systems Change in Driver Licensing. This hui will bring together representatives from local government, central government, philanthropy, iwi, community providers, business, and young people. A report, map of the driver licensing ecosystem, and seed-funded collaborative initiatives for systems improvement are expected outputs from the meeting and we'd like to meet with you after September 3rd to discuss these.

General Comments by Section

Principle Three – We strengthen all parts of the road transport system.

We are pleased to see that road users are included as part of this system.

We would also like to see driver education given some attention here as it is another critical part of the system.

Principle Five – Our actions are grounded in evidence and evaluated.

The government must seek views from road users, young drivers and community driving educators acknowledged in this principle. Statistical data and international data are critical, but qualitative and local data is also necessary to understanding the road safety picture, particularly in understanding road user behaviour.

"I've been fined a couple of times for driving after 10pm. My parents weren't that happy about it but they helped me pay them – they'd rather I drove than took public transport late at night." (student, 19)

"My friend is a good driver. He has been driving for 17 years, but he has failed the New Zealand licence test five times." (Migrant)

"If I had my restricted licence, I'd be happy with that. I would probably just drive on that for a few years." (student, 16)

"Our students all drive. But none of them have licences." (Education provider)

"If nothing happens after a year, you start to get comfortable and worry less about getting caught. It's only proactive people that keep going to get their full licence." (17 year old student)

(quotes from Auckland Co-design, 2016)

Principle Six – Our road safety actions support health, wellbeing and liveable places.

We support this principle, but driver education must be included in the road safety strategy as it is key to supporting health, wellbeing and liveable places.

The 2016 NZIER report to the Ministry of Business, Innovation and Employment highlights the following key facts. These must be considered in the 'Road to Zero' strategy.

- a. Transport disadvantage is a problem in New Zealand

- b. “The number of young people facing barriers to completing the graduated driver licensing system (GDLS) in the most deprived areas in New Zealand is estimated to be between 70,000 and 90,000.
- c. If a 20% reduction in the annual social cost of at fault learner driver crashes and injuries for at fault unlicensed drivers aged between 15 to 24 could be achieved, the annual benefit is estimated to be \$11.6 million
- d. The estimated value of a 10% reduction in the social cost of at fault learner driver crashes and injuries is \$13.5 million for those aged 15 to 24.
- e. Between 9,000 and 10,000 people aged 18 to 24 had no licence when they first signed up for a Jobseeker Support - Work Ready benefit.
- f. If obtaining a licence could help 20% of those beneficiaries into a job at the minimum wage, their combined income after tax would increase by between \$30 million and 34 million in the first year.
- g. The one-off saving for the Ministry of Social Development would be between \$16 and \$18 million and the increased in PAYE and ACC levies would be between \$3 and \$4 million in the first year.
- h. From 2008 to 2013 over 4,703 people aged between 14 and 19 appeared before the court for unlicensed driving and unpaid fines for unlicensed driving.
- i. Fifty six percent of those that appear before the court receive a monetary fine which is similar to the financial cost of completing the graduated licensing system to the level of a full licence.
- j. The issue of people obtaining a partial licence but never completing the GDLS in New Zealand is not limited to just young people.”

We believe access to the road, and transport disadvantaged individuals need to be considered in this plan. The current system positions driver licenses as a private good dictated by market conditions.

The above research highlights a driver license as a social good, and we believe access to, and inversely, barriers to obtaining a licence and to road transport have to be considered under this principle.

Principle Seven – We make safety a critical decision-making priority.

There must be a balanced weighting given to road safety in decision-making.

Safety, the social cost, and the environmental cost should all be critical decision-making priorities. This is consistent with the intent for this strategy to sit alongside Government priorities to “invest in public transport, walking and cycling, and rail infrastructure...reducing emissions and congestion, and resulting in less trauma on our roads”.

If decisions and policies are made in isolation problems can just be shifted to another part of the system. Taking a systems thinking approach can help ensure a more balanced decision is made..

Systems Academy’s module on ‘Wicked Problems’ highlights that when we have a problem the traditional approach is to centralise power. We need to take a step back and look at how a change in one area might affect another. Interdependencies lead to the need for a collaborative approach, and a more holistic approach can help ensure policies don’t push problems to other areas.

Focus Area One – Infrastructure and Speed.

“We also need to help people comply with these speeds... whatever the speed limit, improved compliance and enforcement of the limit plays a vital role in improving the safety of all road users...” (page 38 of ‘Road to Zero’)

We support the proposed review of penalties, demerits and enforcement proposed in this strategy. The current system is failing to stop wide-spread rulebreaking.

The threat of punishment is not deterring speeding in New Zealand, and a review of current enforcement practises is timely.

However, “The current enforcement approach is designed to punish offending – not consider underlying causes, extenuating circumstances, or the impact of the penalties on the offender” (Auckland Co-design Lab, 2016). Penalties beyond monetary fines and demerit points must be encouraged, such as police diversions and referrals to community driver education.

Government must ensure the enforcement of road regulations is effective in reducing rule breaking and doesn’t create inequitable social harm. Giving a speeding fine to someone who can afford to pay it and continue to speed is different from giving a fine to someone on a low income for whom an unpaid fine or lost licence could have a serious social cost.

“Roughly 20% of re-offending is traffic-related. Much of the re-offending is linked to the sanctions themselves (e.g. non-payment of fines, or driving while disqualified)” (NADESU, 2009).

“We also know that there is a small cohort of high-risk drivers that take part in deliberate, high-end and repeat offending and risk taking. These drivers make up a very small part of the population but are significantly over-represented in fatal or serious injury crashes. High-risk drivers include unlicensed and disqualified drivers, high-end alcohol and speeding offenders, repeat offenders, fleeing drivers, and drivers involved in illegal street racing. Many of these drivers do not respond well to traditional enforcement measures and deterrence-based initiatives.” (page 49 of the consultation document).

We also note that the current ‘community driver licensing’ part of the system is under-resourced, and that this needs addressing as part of the system.

“When I was young, my friend gave me a quick turn at driving his 1980s Datsun car, shortly after I was stopped by a Police officer and given a \$400 ticket for driving without a licence. The Police officer gave me an alternative option that if I were to get my Learners Licence within 30 days he would waive my \$400 fine. I studied hard, sat the test, and got my Learners Licence and my fine was waived. The Police officer turned this negative situation into a positive pathway for me, what other opportunities are there to encourage more of this?” (this story is one that our team collected for our work and for this submission)

Focus Area Four – Road User Choices.

“While a safe road system requires us to plan for people’s mistakes by investing in improving our road network...there is also an ongoing task to positively influence people’s behaviour and attitudes on our roads.” (page 48 of the ‘Road to Zero’ strategy)

We need to communicate the benefits of a driver licence to both future and current drivers. We believe that driver education starts well before the Graduated Driver Licensing System (GDLS), and continues well into regular road use behaviour.

It was great to see a mention of continuing to “ensure our driver licensing system and training programmes equip drivers and motorcycle riders with the skills required to be safe, alert and compliant,” however the current system is not delivering on these factors and is overdue a review. It is particularly not delivering on these aspects if road users are not licenced.

It is disappointing to see that there are no immediate actions in this road safety strategy around the driver licensing system and training programmes. This is despite access to licensing and training in particular being highlighted as priority areas for community in consultation for the ‘Road to Zero’ strategy. .

This strategy also states that ‘we also need to reduce the number of people on our roads who are driving without a licence’. Yet there are no actions or clear funding increases to ensure this is possible in the list of immediate actions.

We believe:

1. there is a need to review the resource flow around driver education in New Zealand
2. there is an urgent and immediate action needed to review the impact of the 2014 policy around learners and restricted licences expiring after 5 years. On December 1st 2019 the 5 year licence expiry will come into effect. We’ve heard that 20,000 - 63,000 licenced drivers will become unlicensed in December 2019 and five thousand more every month following. Clearly this policy has not achieved its goal of encouraging drivers to move through all the stages of the GDLS, and we believe the current system is not resourced enough to cope with this increased licensing demand. We’d like to see this added as an immediate action.
3. the April 2019 announcement of \$5million to cover the costs of professional driving lessons for young people on youth benefits mentioned in this report will not see significant outcomes in its current state. According to the policy: "Every student will be offered five hours of professional driving lessons, a defensive driving course, and free testing for their learners' and restricted licence before they leave school." Five hours of lessons is not enough. NZTA recommends 120 hours of practice before sitting the restricted license test. In conversation with community providers we know that this number will change according to the individual. The community drivers we spoke to suggested 40 hours was the average amount of lessons needed from driving mentors and instructors. Five hours is not enough.

We would also like to see:

1. a clear agency/cross-agency group mandated to work on the area of driver education in consultation with stakeholders outside the government system. There is no clear agency responsible for sustainably resourcing driver education, which is a barrier for community wishing to help licence more drivers. We know there are great government and community led initiatives out there in this space, excellent models and examples of best practice. What isn’t happening is sustainable resourcing of these programmes.
2. government acknowledgement that there are inequitable barriers in place to becoming licensed, and that there are people excluded from the road transport system. Some people, particularly Māori and those facing poverty are being excluded from our roads. There’s a social inequity here in regards to access. We can’t invest a great deal in

infrastructure projects and road safety strategies without considering those excluded from participating in transport.

3. free restricted and full driver re-sit tests should be explored as an option for young people under 25 years. This could be made available to young people following a failed practical driving test for a period of 3 months. The average pass rate for the restricted licence is 60%, and the fee is \$86.60 per re-test. The average pass rate for the full licence test is 70%, and the fee is \$59.90 per re-test (NZTA and AA websites).

Focus Area Five – System Management.

In this strategy there is reference to how important community is in the system. Yet what is suggested in this focus area is only national/local government level collaboration and system leadership.

We'd encourage government to invite the key stakeholders in community to the leadership table as well. If road safety is everyone's responsibility, a wider cross-section of stakeholders should be invited to the system management table. Driving Change would be happy to support this action.

Additional Actions – do you have any suggestions about other actions we could consider for future action plans?

"Further research should be done to identify the barriers people face in completing the GDLS and what might be done to achieve higher completion rates" (The Driver Licensing Challenge, NZIER, 2016). Young people in particular, are a key focus area we'd like to propose.

One of the authors of this submission spoke to a youth worker last week who shared the story of how he got his licence. He said he finally got his full licence at 27 years old, it was the first qualification he's ever got and he sat in his car after the test and cried.

"We recommend further research should be done to:

- understand the variety of barriers to obtaining a learner licence and progressing through the GDLS, how they might be related and what is required to overcome them
- quantify the link between the lack of a licence and unemployment
- understand the range and effectiveness of policy options to achieve higher GLDS completion rates
- explore whether positive interventions would help to reduce unlicensed driving and licence breaches more effectively than the current system of financial penalties
- investigate whether the financial penalties imposed for licence infringements are consistent with modern international best practice
- explore options for re-investing the current revenue from driver infringements into initiatives that directly address the driver breaching behaviours. For example, reinvesting the revenue into compulsory driver education courses for young people which are aimed at increasing road safety by proactively supporting individuals to progress through the GDLS" (The Driver Licensing Challenge, NZIER, 2016).

We'd like to see more research and an action plan around the following challenges:

- "an insufficiently compelling value proposition for getting fully licensed, and widespread normalisation of breaches
- barriers to access for vulnerable New Zealanders to the essential resources needed to gain a driver's licence, which the broader system is failing to address

- system and process issues affecting how driver licensing is currently delivered, and an expensive enforcement response that isn't changing behaviour." (Auckland Co-design Lab, 2016)