



Driving
Standards
Agency

Response to consultation report:

Review of language support provided for driving test candidates

A report on the consultation which asked for views on the language support available to driving test candidates.

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Executive summary

1. This paper reports the outcome of the Driving Standards Agency's (DSA's) consultation exercise about reviewing the level of language support provided for driving test candidates. The consultation was held between 5 February and 2 April 2013.
2. DSA provides voiceovers in 19 languages on theory tests, in addition to English and Welsh, and allows the use of interpreters on theory and practical tests. The review considered a number of options. These were:
 - Option 1 - Remove voiceovers on theory tests and cease to allow interpreters on theory and practical tests
 - Option 2 - Remove voiceovers on the theory test but retain the use of interpreters on all tests
 - Option 3 – Remove interpreters on both tests but retain the use of voiceovers for the theory test
 - Option 4 - Do Nothing
3. The aims of the consultation were:
 - to address concern about road safety – specifically the ability of non-English or Welsh speakers to understand road signs and other information provided to drivers in the course of their journeys
 - to enhance social cohesion – encouraging integration in society by learning the national language
 - to reduce fraud – addressing the problem of an interpreter attending for test with a learner driver and communicating advice beyond a strict translation of the theory test questions or the instructions given by the examiner
 - to reduce costs – there would be a small saving to DSA from not paying a fee to the theory test service provider for the annual update of voiceovers
4. The paper also consulted on the time period for making any change and for ways of avoiding an increase in unlicensed driving.
5. There was broad support for Option 1. Following careful consideration of the views put forward, ministers have decided to introduce this option. The changes will take effect for tests taken on or after 7 April 2014.
6. Language support in English and Welsh will, however, continue for special needs candidates, including the service provided by British Sign Language interpreters, or for those with dyslexia.

Introduction

7. On 5 February 2013, DSA published a consultation paper; 'Review of language support provided for driving test candidates'.
8. To promote the consultation we:
 - wrote to key motoring stakeholders
 - promoted the consultation on the government website
 - issued a press notice
 - sent email alerts to those driving instructors who have signed up to receive them
 - placed notices in those theory and driving test centres where non-English or Welsh voiceovers have been provided and where candidates have been accompanied by interpreters
 - asked the Equality and Human Rights Commission to advise their stakeholders of the consultation
9. The consultation was conducted online. The closing date for responding was 2 April 2013.

Responses to the consultation exercise

10. There were 1,996 responses to the online consultation. Those responding included driver trainers, bus companies, representatives of trade unions and small businesses.
11. Ministers would like to thank everyone who contributed to this consultation.

Summary of views

12. The proposal to withdraw all language assistance, received support from the majority of those who responded. There were recurring points in favour throughout the responses, with a strong view emerging that to be able to drive in Great Britain an individual should be able to understand the national language.
13. A significant theme was road safety. Many agreed that a lack of understanding of the national language meant that some drivers may not be able to understand road signs, converse with traffic enforcement officers or read details of the rules of the road. Others were concerned about the potential for the interpreter to give the candidate instructions during the test. There was also support for the aim of promoting social cohesion, through encouraging candidates to learn the national language, and for the potential savings to DSA from no longer paying for voiceovers.

14. Views expressed by those who wished to retain language support included that there is no evidence that the current procedures are unsafe and that most road signs are language-neutral because they are pictorial. The point was made that Great Britain is a multicultural society with sizeable numbers speaking languages other than English or Welsh. British drivers are also allowed to drive elsewhere in Europe, without necessarily speaking the native language, under arrangements applying to all EU member states.
15. There was also concern that, if language support was not available, candidates from other EU member states may return to their own country to pass the test. This may be a more straightforward route to a community model driving licence, which could be used to drive in Great Britain. This was considered by some to be less conducive to road safety than passing a test in British road and traffic conditions, albeit one with language support.
16. The consultation sought views on the notice that should be given for introducing any change. There were a variety of views expressed; with some wishing to make the changes without delay and others wanting to give a longer period of notice to those who were learning to drive. Many felt that the 6 months proposed was adequate.
17. The consultation also sought views on how to avoid a potential increase in unlicensed driving, arising from changes which might make the test more difficult for some. Most responses focused on enforcement, including stronger penalties for offenders. Other suggestions included:
 - increasing road police presence
 - greater use of technology, such as automated number plate recognition
 - compulsory carriage, and possibly display, of driving licences to make it easier to check entitlement of drivers
18. Those seeking to encourage compliance suggested that the cost of insurance and tests could be lowered and that an advertising campaign, based on the rules relating to unlicensed driving, would be helpful.
19. A more detailed summary of the points made in response to each of the options is presented in Annex A.

Comments on the impact assessment

20. In the draft Impact Assessment (IA) we estimated the costs and benefits likely to arise from each option. Comments tended to reflect those expressed in response to the other questions in the paper – primarily views about road safety and the need for those driving in Great Britain to speak the national language. The main issue raised was the time it would take to learn a new language. Some comments focused on the view that those

with no knowledge of English or Welsh may need to study for significantly longer than we had estimated in the IA.

21. It is acknowledged that the time required to learn the language may not be the same for everyone. Some of those who currently make use of voiceovers and translators will already have some knowledge of English or Welsh and will be able to acquire more advanced linguistic skills through regular discourse with family, friends and wider society. Other candidates may need more formal tuition to reach the same level of expertise, such as attending English for Speakers of Other Languages course. The level and duration of the course attended will depend on the standard already obtained.
22. The estimates in the IA are an overview, encompassing the various scenarios. The low and high ranges are intended to reflect the varying levels of expertise and timescales required for learning the language. In addition, the cost estimate represents the charges made for courses at levels covering the needs of both beginners and those with a fairly strong knowledge of the national language. There will also be benefits wider than the driving test.
23. We have revised the draft IA in the light of the comments made and the final version is published alongside this response to consultation.

Decisions taken

24. Ministers have carefully considered the views expressed. They have also evaluated the options proposed, to determine whether there is a measure short of the full withdrawal of language support which would achieve the aims of the consultation – improved road safety, reduced fraud, encouragement of social cohesion and reduced costs.
25. In analysing Option 2 (retention of interpreters) and Option 3 (retention of voiceovers), ministers took the view that neither achieves the full aims of the consultation. Both options would perpetuate the situation where a candidate did not understand the national language. In addition, the use of interpreters under Option 2 would continue to allow the possibility of the candidate receiving instructions over and above the strict translation of the examiner's directions on test.
26. Only Option 1 – full withdrawal of voiceovers and interpreters in all tests – would achieve the aims of the consultation. This measure would require a candidate to be able to undertake the test in the national language, remove the possibility of tuition being provided through an interpreter and encourage social cohesion. It would also reduce the cost to DSA of providing voiceovers and investigating fraud.
27. Ministers have therefore decided that tests will cease to be conducted (except in English or Welsh, including those for candidates with special needs) with voiceovers or

interpreters from 7 April 2014. This is in line with the 6 months' notice that was generally supported in the consultation.

28. The issue of how to avoid an increase in unlicensed driving will be kept under review when future changes are made. Ministers are grateful for the suggestions made by those who responded.

Next steps

29. The changes will be implemented administratively. Language support for driving tests is not included in legislation, so there is no need for a regulatory change.
30. Further information about the changes will be given on the DSA website: www.gov.uk/dsa. Email alerts will also be issued.

Annex A: details of responses

Breakdown of responses by organisation type

| | |
|---|-----|
| Small to medium-sized enterprise (up to 50 employees) | 294 |
| Large company | 78 |
| Representative organisation | 18 |
| Trade union | 7 |
| Interest group | 46 |
| Local government | 20 |
| Central government | 85 |
| Police 11 | |
| Member of public | 557 |
| Other 331 | |
| Not answered | 549 |

Question No. 1 - Do you agree that we should allow theory and practical driving tests to be taken only in English and Welsh and remove voiceovers and interpreters from those tests?

Breakdown of responses by strength of opinion

| | | |
|-------------------|------|--------|
| Totally Agree | 1429 | 71.59% |
| Largely Agree | 105 | 5.26% |
| Slightly Agree | 25 | 1.25% |
| Slightly Disagree | 28 | 1.40% |
| Largely Disagree | 63 | 3.16% |
| Totally Disagree | 327 | 16.38% |
| Not Answered | 19 | 0.95% |

Summary of views expressed

1. Those strongly in favour of the proposal felt that test candidates should know the national language. Road safety was a strong consideration. Respondents expressed concern about the ability of non-English/Welsh speakers to understand the messages on increasing numbers of road signs, including warnings, emergencies, motorway signs and diversions, and The Highway Code. Some pointed to the cost of fatal accidents and others commented that it would be difficult to obtain insurance details, in the event of an accident, from drivers who did not speak English. Interpreters and other language assistance would not be available to drivers following a successful test.
2. Other concerns included the prevalence of fraud on test, with the interpreter giving candidates instructions. Some pointed to social cohesion and supported promoting this

by encouraging candidates to learn the national language. Cost was also mentioned, with the suggestion that there could be savings by no longer paying for voiceovers.

3. Those opposed to the proposals felt there was no evidence that the current procedures were unsafe (most road signs are pictorial), and that knowledge and understanding of driving was a different issue from being able to speak the national language. The proposal may prevent people from gaining a driving licence, which is one of the ways that people can contribute to the economy.
4. Another effect may be to encourage candidates from elsewhere in Europe to return to their own country, pass the test in their native language, and return to Great Britain. Some felt that there could also be an increase in unlicensed driving as a result of the proposal. It was suggested that that the number of voiceovers should, in fact, be increased to reflect the number of languages spoken in Great Britain today. One suggestion was that candidates could pay a higher fee for tests with voiceovers.

Question No. 2 – Do you agree that we should remove voiceovers but allow interpreters on all theory and practical tests?

Breakdown of responses by strength of opinion

| | | |
|-------------------|------|--------|
| Totally Agree | 124 | 6.21% |
| Largely Agree | 37 | 1.85% |
| Slightly Agree | 60 | 3.01% |
| Slightly Disagree | 49 | 2.45% |
| Largely Disagree | 142 | 7.11% |
| Totally Disagree | 1524 | 76.35% |
| Not Answered | 60 | 3.01% |

Summary of views expressed

5. The vast majority of those opposing this proposal did so because they wish to see both voiceovers and interpreters removed. Reasons cited were fraud, road safety, social cohesion and cost. Many respondents were simply opposed to language support and took the view that this would be a 'half way house' and would not achieve the aims of the consultation. If language support was to continue, voiceovers were preferable as there was no opportunity for people giving instruction to provide additional information to the candidate. It was observed that most learner drivers could take a test in English, even those who did not speak it fluently.
6. A small number commenting wished to keep both. Views expressed were that removing interpreters and voiceovers was discriminatory and may alienate sections of society. Also, if non-British residents were required to take a test, there should be provision for them to do so. Language support helps people gain access to employment and

contribute to society, for example through taxation. It was queried whether, if voiceovers were removed, there would be sufficient interpreters to meet demand.

7. Voiceovers were considered less satisfactory by some, with reasons given being quality, the fact that they could quickly become outdated and that it was easier for interpreters to keep their knowledge updated and they could clarify some English words. It was also suggested that interpreters should only be allowed on practical tests and that post-test restrictions should apply, such as limiting the successful candidate to driving with an interpreter.

Question No. 3 - Do you agree that we should remove interpreters from all tests but allow voiceovers on theory tests?

Breakdown of responses by strength of opinion

| | | |
|-------------------|------|--------|
| Totally Agree | 335 | 15.78% |
| Largely Agree | 122 | 6.11% |
| Slightly Agree | 114 | 5.71% |
| Slightly Disagree | 52 | 2.61% |
| Largely Disagree | 127 | 6.36% |
| Totally Disagree | 1178 | 59.02% |
| Not Answered | 68 | 3.41% |

Summary of views expressed

8. It was recognised by both those who supported and opposed the proposal that, as voiceovers were pre-recorded, DSA maintained control over test content. This option was preferable as it was less likely to result in fraud than the use of interpreters.
9. Those who disagreed with the proposal were concerned that drivers who made use of the voiceover facility would not be able to understand English or Welsh after passing the test – and would not be accompanied by an interpreter. There was also concern about social cohesion.
10. Comments from those in favour included the suggestion that it was better for a driver to pass the test in Great Britain, with a voiceover, than overseas, where the theory test may be more aligned to local requirements. Others felt that other European countries allowed translations and it was more important to be able to understand the subject matter than the language it was written in.
11. Some considered that the infrastructure was already there for voiceovers and drivers may be encouraged to take the test by the option of using this facility. The voiceover provided useful assistance, giving everyone an equal opportunity and gave confidence to those with learning difficulties or who were dyslexic.

Question No. 4 - Do you agree that we should make no change?

Breakdown of responses by strength of opinion

| | | |
|-------------------|------|--------|
| Totally Agree | 238 | 11.92% |
| Largely Agree | 46 | 2.30% |
| Slightly Agree | 33 | 1.65% |
| Slightly Disagree | 25 | 1.25% |
| Largely Disagree | 74 | 3.71% |
| Totally Disagree | 1523 | 76.30% |
| Not Answered | 57 | 2.86% |

Summary of views expressed

12. The majority of those responding were in favour of change and were again concerned about issues such as road safety, fraud, cost and the need for social cohesion. There was a general view that only by removing voiceovers and interpreters could these issues properly be addressed. It was considered that those driving in Great Britain should learn English or Welsh as this would enable them to understand road signs, prevent them from cheating by use of interpreters and help to integrate within society.
13. Those who supported the status quo considered that the current system served its purpose. Many of the candidates who benefited were good drivers but not accomplished in English – and linguistic skills did not make an individual a better driver. Many road signs were pictorial, which could be understood irrespective of language. The relevance of some signs on motorways was also questioned.
14. If the changes were made there was concern about the number of drivers who may obtain their licenses abroad, which may not equip them for driving in Great Britain. This may offset the small saving by reduced fees from with tests. There was also concern about an increase in unlicensed driving.

Question No. 5 - Do you agree that 6 months from the announcement of a decision following this consultation would be a reasonable period of notice for implementation of the changes?

Breakdown of responses by strength of opinion

| | | |
|-------------------|------|--------|
| Totally Agree | 1051 | 52.66% |
| Largely Agree | 314 | 15.73% |
| Slightly Agree | 127 | 6.36% |
| Slightly Disagree | 85 | 4.26% |
| Largely Disagree | 74 | 3.71% |
| Totally Disagree | 325 | 16.28% |

| | | |
|--------------|----|-------|
| Not answered | 20 | 1.00% |
|--------------|----|-------|

Typical examples of views expressed

15. There were a variety of views expressed about the timescale – ranging from immediately to 2 years. Many felt that the 6 months proposed was adequate. Others considered that it was too short because it takes time for an individual to learn a new language, especially in view of the complexity of the English language. Others felt that there would be an impact on businesses if the period of notice was not increased - affecting interpreters, publishers of driving test material in different languages and those instructors concentrating on non-English or Welsh speakers. Some thought there may be a rush of demand for tests.
16. Those who wanted a shorter period felt that the decision should not be delayed any further. There was a risk in terms of road safety of missing the opportunity to make the changes if they were not implemented as quickly as possible.

Question No. 6 - Do you have suggestions on how we could limit an increase in unlicensed driving which could arise from the changes?

Summary of views expressed

17. The main focus of comments was enforcement. Many felt that there should be an increase in road police presence with greater use of automated number plate recognition. Some also thought that carrying – and maybe displaying on windscreens - of driving licenses should be compulsory, so it would be easier to check entitlement of drivers, which should be achievable by spot checks. Many supported stronger penalties for unlicensed driving. These included prison sentences, large fines and confiscation of vehicles.
18. Suggestions included:
 - use of technology in all vehicles which would recognise driving licence details
 - DVLA passing details to the police when the vehicle is stopped
 - linking provision of driving licence details when seeking insurance, and buying or taxing vehicles
 - compulsory fingerprinting of offenders
 - DNA testing of offenders
 - a 24 month probationary period after an offence
19. Some of those seeking to offer encouragement for compliance suggested that the cost of insurance and tests could be lowered. There were some comments that an advertising campaign promoting the rules about unlicensed driving may be helpful.

Question No. 7 - Do you have any comments about the assumptions made in the Impact Assessment?

Summary of views expressed

20. The majority of responses were either non-critical, or supportive, of the assumptions in the IA. Most who responded added commentary supporting their views on the issue of language support.

21. There were, however, some which queried the reasons for the changes. These included suggestions that:

- the road safety concerns were tenuous
- there would be a growth of fraudulent activity
- some would obtain a licence abroad and return to Great Britain, which may be more of a risk

22. In addition, there was comment that the time that a candidate would need to learn English or Welsh may be underestimated.

Question No. 8 - Do you have any overall comments on the Impact Assessment?

Summary of views expressed

23. Most of the comments against the IA reflected views expressed elsewhere in the responses to the proposals. Some supported the proposals to withdraw language support for tests. The reasons given were essentially the same – primarily road safety and the need for those driving in Great Britain to speak national language. Others commented on the social cost of the change, which would affect the mobile workforce and their employment. This may affect demographics, social movement of labour and cause isolation of the migrant population. One commentator suggested that those from the EU will be able to return to their country of origin and take a test without the benefit of training in Great Britain.

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