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Fédération Européenne Des Auto-Écoles
European Driving Schools Association
Driver Training For Life

Position Paper on the Revision of the Driving Licence Directive 2006/126/EC

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Background

The frequency of road accidents, their severe consequences and the worldwide existence of the problem have forced many international organisations to intensify their work on possible practical actions to reduce road fatalities.

Driver training and road safety, which have always been closely related, can no longer be addressed by traditional and sometimes obsolete methods and programmes. Transport dynamics are changing, and training programmes need to be rethought, considering the changed mobility scenarios of 2030 and beyond.

Today, the possibilities and challenges are more significant. On the one hand, more than 30 years of experience allow us to state that 90 per cent of people who attend a driving school to obtain their licence do not necessarily strive to drive safely. On the other hand, our knowledge has been reinforced by years of research, evaluation, and improvement of successful driver training experiences. In other words, the model according to which trainees attend a driving school only to obtain a driving qualification needs to be updated.

The attitude that trainees attend a driving school only to obtain a driving qualification and lack of transparency must be overcome, to strengthen efforts to educate future drivers.

Currently, neither Directive 2006/126/EC of the European Parliament nor the Council Directive of 20 December 2006 on driving licences addresses the issue of driver training programmes. To achieve the road safety goals of the new 2020-2030 decade, it is necessary for all Member States to commit to a minimum standard in driver training criteria and to determine minimum competencies and objectives for driver training and testing. Furthermore, these minimum competencies must be reflected in the Driving Licence Directive.

To solve the challenges posed by the lack of harmonised standards for driver training in the EU Member States, the European Driving Schools Association (EFA) has researched and developed a comprehensive and integrated model suitable for all its members for many years. The EFA model aims to proactively empower current and future drivers by addressing key topics, including risk perception, risk factors in driving, new technologies, sustainable driving, mobility and how to respond and intervene in the event of a road accident. The training model proposed by EFA justified and adapted to current and future needs is supported by a road safety knowledge matrix called 'The EFA MATRIX' (Annex 1).

Priority Recommendations

1. Graduated driving licence system and a new training concept: Safety First through quality standards for training and testing

Graduated driving licence system

The Graduated Driving Licence System (GDLS) is designed to gradually equip new motor vehicle drivers with experience and skills in low-risk environments. Typically, new drivers go through three stages. The start of the GDLS is the acquisition of a driving licence which then becomes a limited, probationary, or provisional licence to transform into a full licence. Graduated driving licences usually do not allow driving at night, on motorways, driving under alcohol use and being unsupervised during the initial stages. These restrictions are lifted over time, enabling further testing of the individual and allowing the final acquisition of a full licence. EFA supports the complete introduction of graduated licensing in all EU states following international best practices.

New training concept

EFA proposes an innovative training model that is justified and adapted to cover present and future needs, supported by a road safety knowledge matrix named ‘The EFA MATRIX’ (Annex 1).

The “EFA Matrix” covered several topics based on road safety awareness. New topics and approaches to driver education are:

- First aid (BLS)
- The use of ADAS
- Eco-driving
- Hazard perception

Quality standards for training

The EFA matrix indicates the key steps in driver training in road safety awareness. The quality requirements for training must be certified and standardised in all countries to create road safety awareness. As shown in Annex 2, face to face theoretical driver training is essential, and some specific topics could be learned optionally (in addition) using highly reliable driving simulators.

Quality standards for testing

EFA would like to highlight the standards for reliable and transparent driving tests and emphasise that increasing the fairness of examinations should be accompanied by measures to strengthen the ability of citizens to act based on general laws if we want to see positive effects on corruption (Annex 3).

Harmonisation of training to become examiner or instructor

The initial and periodic training of driving examiners and instructors is essential. The training system to become driving instructors and examiners is based on outdated curricula, increasing the gap of the examiner's point of view and the instructor's training capacity compared to real life. Examiners and teachers have part of the courses in common. A modular system, similar to those applied in universities, is the most effective (Table 1 for examples of modules).

After these standard modules, courses will be held on specific monographic areas based on the chosen topic to obtain the qualification of road safety examiner or driving instructor or driving teacher. A final test will be held to verify the knowledge of the learner.

EFA recommends the urgent need to update the curricula of driving examiners and instructors in terms of knowledge needed to deal with current technological challenges and skills to better handle increasingly complex situations in future driver education.

2. Powered Two Wheelers (P2W) licences and training certification at the EU level

The scientific literature and accident data indicate that a high level of competence is required for motorcyclists. A tiered licence system could reduce the number of accidents, but the EU licence directive must provide an accurate tiered system. The system requires that from the age of 18, riders have direct access to a 35 kW motorbike and from the age of 24 to an unrestricted motorbike (direct access only). These age limits can reduce the adverse effects of technical and road inexperience.

The transition from driving up to 35 kW (A2) to motorbikes without power limitations (A) is not uniformly regulated in all countries. In some EU countries, as Belgium, Bulgaria, Estonia, Germany, Greece, Hungary, Netherlands, Portugal and Sweden it is currently carried out using a driving test by EU directives. However, this test does not imply an improvement in the driver's knowledge but only a further test of driving the motorcycle.

In contrast, training in other EU countries, such as Austria, Czech Republic, Croatia, France, Italy, Ireland Norway and Spain, is certified by driving schools on topics derived from the scientific literature on accidents involving power-two-wheelers. Certified driving school training could improve knowledge and awareness of road hazards when driving unrestricted vehicles. For example, certified training could improve understanding of motorbike anti-lock braking systems (ABS). ABS prevents wheel locking, reduces braking distance and, most importantly, increases stability. It deals with both scenarios of braking too hard and failing to brake, common factors in motorbike accidents and injuries. As there is growing evidence that this system could help prevent accidents, many countries, including members of the European Union, have mandated that some road motorbikes be equipped with ABS (Rizzi et al., 2015).

Furthermore, the introduction of a certified driving school system for P2Ws could alleviate the problem of a shortage of examiners, which is present in many EU countries.

EFA supports the transition between categories through certified training. The certified training will focus more on the fundamental themes of road safety, such as risk perception and the already mentioned ADAS systems.

AM driving test at the EU level

The AM driving licence allows to drive manual or automatic gearbox mopeds in EU countries. It is the first step as motorised road users for young drivers. Over the years, legislation has raised the age for obtaining this licence to 14 (or 15-16), but not all EU countries have applied the directive similarly. EFA believes that an important step to increase the safety of these young drivers and reduce the accident rate is to apply the theory and the practical test for the AM licence to all EU states.

Introducing an E-scooter permit if riders have no AM licences

Crash rate data from European countries indicate increased accidents with e-scooters involved. The law differences between the various countries show that for some EU countries, there is an age restriction for using an e-scooter, while for others, there is no (Annex 4).

EFA recommends to introduce a mandatory E-Scooter permit until the (young) riders acquire a AM driving licence. The AM, A1 or B driving licence or higher should include a E-Scooter permit. The minimum age should be indicated by specific regulations.

3. Professional drivers

Data from trade associations show that the shortage of Heavy Goods Vehicle drivers is widespread in Europe, with a shortage of over 400,000 in the EU. In Europe, up to 425,000 truck driver positions, or 10% of the total, remained vacant in 2021, with an expected increase to 14% by the end of this year. Bus and coach operators need more than 17,000 drivers, or 7% of their workforce, which is expected to increase to 8% by the end of 2022 (IRU, 2022). The shortage of drivers in the EU is caused by several reasons, including low wages, a bad image of work among young people, inadequate treatment of workers and finally, the difficulty of obtaining the necessary licences to drive these vehicles. This situation could worsen due to the ageing workforce (the average age of truck drivers is over 50) and the difficulty of hiring young people. Several possible solutions are proposed, and some of these, supported by EFA, will be indicated in the following paragraphs.

Introduce a graduated certification system for professional driving licence

EFA proposes to introduce a gradual training system that can facilitate the entry of young drivers into the world of professional driving. Lower the age of attainment and introduce a graduated certification system. Young drivers can start from getting C1 licences and the transition to higher categories can take place through certified compulsory training, as is the case for lower category licences (i.e. A2 to A) without having to repeat the practical exam. Also in this case, the certification of mandatory training courses reduces time and simplifies bureaucracy, makes users and driving schools responsible and facilitates the task of the examiners who will have to evaluate the permanence of the requirements of the education centres and the teaching staff.

EFA also suggests to consider a better alignment between the driving licences directive and the Certificate of Professional Competence (CPC) directive.

Mandatory initial and periodical training for all professional drivers also 2,5t < 3,5t

The EFA draws attention on the need of introducing Light Goods Vehicle (LGV) and Taxi training courses. The EFA proposes a *soft version* of the Certificate of Professional Competence (CPC) for drivers of 2.5t to 3.5t LGVs and Taxi drivers. In Europe, continuous growth of e-commerce is estimated in the coming years. This will lead to more and more goods being transported via LGVs. EFA recommends initial and periodical training of drivers who transport goods and passengers professionally.

4. Skills' update for expert drivers

A country's regulatory update should go hand in hand with the technical update of the vehicles on the road. Drivers' knowledge and skills should be kept up to date with both regulatory changes and vehicle technology. In Europe, around 80% of drivers obtained a driving licence at least 20 years ago. It has become necessary to introduce periodic training, or an extraordinary update to adequately train drivers on the correct functioning of the safety devices of vehicles on the road. The widespread use of Advanced Driver Assistance Systems (ADAS) has made it possible to improve vehicle safety, but risks being an unexploited opportunity.

EFA recommends mandatory additional training for drivers intending to drive vehicles with SAE level 2 technology.

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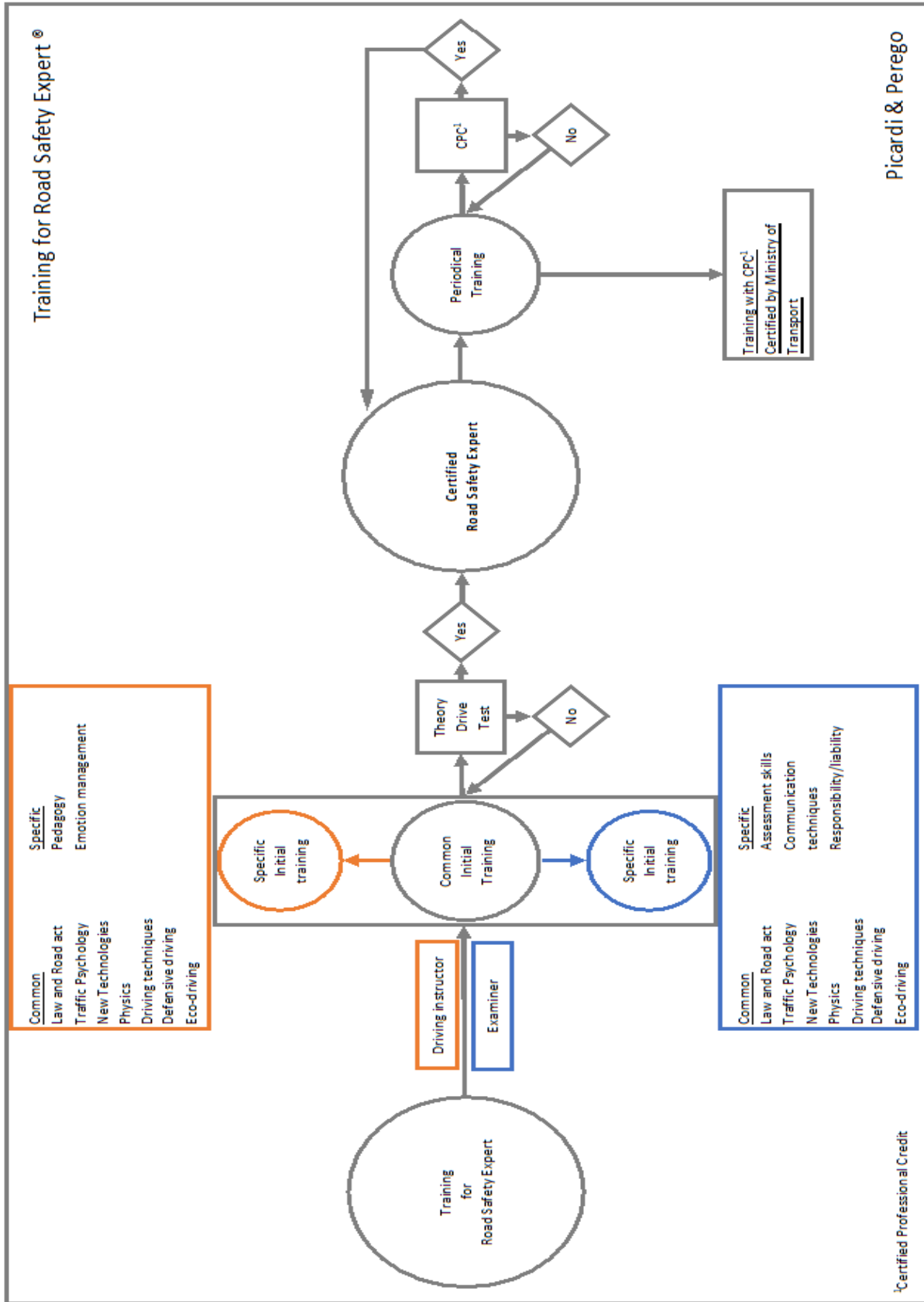
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Table 1: Training for Road Safety Experts



Annex 1: The EFA MATRIX

		EUROPEAN CLASS "B" LICENCE	
		TO BE DONE AT THE DRIVING SCHOOL	TO BE DONE AT THE DRIVING SCHOOL
		<i>(Certified / Not tested)</i>	<i>(To be tested by administrations)</i>
THEORY	Causes and consequences of traffic crashes*		Rules and regulations
	Risk/hazard perception		Traffic signals
	Norms and conduct: legal and personal responsibility*		Driver's documentation and insurance
	Vulnerable groups of road users		Risk/hazard perception test
	Risk factors: speeding, alcohol & drugs, and distractions*		Main risk factors
	Passive and active safety: ABS, seatbelt, helmet, child restraint systems, etc.		Ecological and economic driving: Vehicle and environment
	Post Collision care		Car maintenance and basic vehicle technology
PRACTICAL	Basic maneuvers in closed circuits		Parking and vehicle maneuvering (stopped and moving)
	Urban areas and e-mobility		Urban roads
	Rural/regional roads		Rural/regional roads
	Highways/motorways		Highways/motorways
	Adverse weather conditions		Safe use of ADAS
	Night driving		Mechanical components and vehicle safety
	Ecological and economic driving		
	Safe use of ADAS		

Figure 1 The EFA MATRIX: A training framework for CLASS-B licensing in Europe

The EFA matrix, consisting of a double-entry table, specifies the content (theoretical and practical) necessary for the comprehensive training of European drivers in legislation, vehicle management and road awareness. In the first column of the matrix, a series of theoretical (work in the classroom) and practical (work in the vehicle) subjects are listed based on awareness, sensitisation, and broad training on safe attitudes. These contents would be mandatorily taught in road training centres or driving schools, although their evaluation could be optional. Therefore, an official certification model is proposed and audited by the competent administrations and training centres.

In the second column of the matrix, a series of theoretical and practical (in-vehicle) contents are proposed. These training contents will lean on crucial issues for road safety, such as traffic

regulations, critical manoeuvres and driving on different types of roads. The contents of this column would be subject to evaluation by the competent administrations of each member state of the European Union.

The different contents included in each section of the EFA MATRIX, as well as their rationales, are grounded in three separate sources: scientific literature; the positive experiences of each country of the European Union in the field of drivers' training during recent years; and the opinion of prominent EFA specialists with extensive experience in drivers' training, as well as other experts in the field of road safety (European Commission, 2017; INTRAS, 2018).

Finally, based on a comprehensive approach to road safety in the European Union, performed in consideration of the four significant spheres of transport (i.e., roads, vehicles, police control and human factor), we would like to make an additional consideration on behalf of all members of EFA. During the last two decades, many substantial transformations have contributed to the improvement of critical areas of road safety: better vehicle active & passive safety systems (many of them already mandatory), better designed and safer roads, crucial technological developments (such as ADAS), and better systems aimed at detecting and controlling traffic offenders. All of them are gaining ground across the European Union. However, as for the human factor -clearly, the one with the most significant weight when it comes to causing and preventing crashes- only a few actions have been promoted in the field of driver training, and this is paradoxical if we consider that improving the drivers' training is the "first step" towards ensuring safe driving. The vision of EFA and the spirit of this proposal claim urgent actions aimed at drivers' training to timely accomplish the road safety goals expected for the year 2030 in the European Union.

Focus on awareness, not just on the exams: the role of technology in training certification to avoid fraud

People, who are all fallible, are generally recognised as one of the weakest links in road safety and safety systems. The objective of road safety awareness, training and education are to improve safety through:

- Awareness of the need to be educated in road safety
- The development of skills and knowledge that enable road users to carry out their activities more safely
- The acquisition of in-depth knowledge to handle even the most critical situations

The transition to more conscious training must necessarily occur through certified training rather than exclusively through a practical test of driving requirements. This generally leads to devaluing the training to teach what is necessary to pass the test.

Certified training demonstrates that the potential driver has the specific skills to do the job, and anything less than a valid certification is a risk. From this point of view, EFA, with its experience in European projects, emphasises the importance of theoretical in-presence training based on the EFA MATRIX. A study conducted in Italy during a theoretical lecture for obtaining a driving licence showed that the cognitive activity of the subjects, in terms of attention and mental engagement, is more significant for those in classroom presence than for the remote mode.

Another problem is the rising trend of fraudulent training certificates, mainly due to technological advances. In recent years, websites offering assistance for fraudulent credentials are becoming increasingly popular. Some people pay the fee online and take a shortcut to achieve their certification goal. It is necessary to be sure of the qualifications of those who will then be road users. EFA, therefore, recalls the possibility of using security tools for inbound and outbound recognition of those taking certified classes and monitoring systems throughout the training activity.

New contents of the training

As explained previously, the “EFA Matrix” covered several topics. New topics and approaches to driver education are described in the following paragraphs.

First aid (BLS)

Drivers must be aware of first aid measures from both a theoretical and behavioural point of view because the first few minutes (the so-called 'golden minutes') are crucial to avoid deaths or psychophysical consequences among injured road users. This awareness of the rules and regulations relating to first aid will allow an appropriate response and enable one to protect oneself and other road users safely and responsibly.

An evaluation of first-aid training has been carried out over the years, and the results have shown the need to change the system of first-aid courses in driving schools to more relevant forms of training (Kureckova et al., 2017). Experience-based first aid training focusing on knowledge and skills and the psychological framework is a practical part of driver training that can help reduce the number of deaths and serious injuries caused by road accidents.

The steps to follow, agreed upon by international organisations and shared by EFA, can be summarised by the acronym BLS or Basic Life Support. BLS describes a set of basic life-saving first aid techniques.

A set of guidelines for the administration of Basic Life Support by lay or professional first aiders cover the following aspects:

- Safe management of an accident

- Management of an unresponsive breathing casualty (recovery position)
- Management of an unresponsive casualty who is not breathing (Cardio-Pulmonary Resuscitation and chain of survival)
- Management of a choking casualty, both mild and severe (back slaps and abdominal thrusts)
- Use of an automatic external defibrillator, if available

All first aid courses that driving schools run to educate new drivers should cover this essential life support (BLS) technique according to current international guidelines.

The use of ADAS

Advanced Driver Assistance Systems (ADAS) are a set of technologies that help drivers to prevent road risks, avoid crashes and enhance the driving experience (Benson, Tefft, Svancara & Horrey, 2018; Souders, Best & Charness, 2017). Currently, there are many types of ADAS; most commercialised vehicles include helpful features, such as emergency braking systems, lane departure warnings, adaptive cruise control, pre-collision systems, and pedestrian detection devices. Given their usefulness and effectiveness, the European Union has introduced some types of ADAS on a mandatory basis, and others will be progressively promoted and regulated in the future (Regulation (EU) 2019/2144; Euro NCAP, 2020). However, ADAS's greater availability and usefulness may be impaired by some fundamental user-related constraints, such as a growing mistrust and ignorance regarding the value of technological developments for road safety (Lijarcio et al., 2019; BOSCH & FESVIAL, 2020). For this reason, it is necessary to articulate vehicle automation with driving training to maximise the safety-related and further benefits of ADAS technologies among new drivers (Sætren et al., 2018; Nylen et al., 2019). Since it also encompasses many other contents related to vehicle safety, driver licensing constitutes the ideal scenario for fostering formative & informative actions on ADAS and driving safety.

Eco-driving

Several stakeholders, such as official institutions, governments, large private entities, universities, and researchers (many of them within the European Union), have raised many directives, standards, laws, and recommendations to reduce polluting emissions. Specifically, in the European Union, it is intended to diminish these emissions by 55% by the year 2030. During the last decades, the proportion of overall energy used by road transport increased from 23% (1971) to 29% (2017), with oil derivatives being the most predominant and polluting matter (IEA, 2019). Nowadays, many drivers do not act concerning vehicles or eco-driving, whether because they are not fully aware of the problem or just because they do not know how to act. Given this situation and the significant contribution of motor vehicles to climate change, there is a large set of actions that must necessarily be directed at

road users (e.g., in low visibility conditions, education, training, and more/better information). In this regard, driver training is an ideal scenario for addressing topics such as the current pollution problem derived from vehicles; mechanical maintenance to avoid pollution; green and efficient driving; alternative vehicles and transportation means; and non-polluting motor vehicles (Ministerio de Fomento, 2019; Paris Climate Change Agreement, 2016). EFA states that training is fundamental in optimising energy consumption and environmental sustainability through more efficient mobility.

Hazard perception

For many years it was thought that the leading cause of road accidents was a lack of driving skills. Therefore, training in other areas outside this domain was not considered relevant, being relegated to second place to driver education, the primary purpose of which was acquiring manoeuvring skills. Today, this approach to driving safety is mostly considered wrong: although driving skills are necessary, more is needed to prevent most accidents. Instead, decision-making and risk/hazard perception have been shown to play a crucial role in avoiding road hazards (Beanland et al., 2013; Montoro et al., 2000). For example, drivers with higher risk perception and better decision-making processes are more likely to avoid potentially problematic driving scenarios involving risky driving behaviours or manoeuvres. Conversely, they tend (for example) to drive at a prudent speed, use sound safety systems and avoid difficult roads (Porter, 2011; Tronsmoen, 2010; Montoro et al., 2000). Available scientific evidence supports the value of increasing risk/hazard perception and improving driver decision-making through road safety training as an effective road safety strategy. The enhancement of risk perception must be carried out by both driving instructors and IT developments (Horswill, 2016a; Tronsmoen, 2010; Mayhew & Simpson, 2002). For example, including a hazard perception test in the UK driving licence process helped reduce drivers' likelihood of an accident by 11.3% during the first year of follow-up (Horswill, 2016b).

Annex 2: Quality standards for training

Face-to-face training for skills

As mentioned in the introduction, EFA supports theoretical driver training and supports this thesis with the study carried out for the project co-funded by the European Commission under the Horizon 2020 project "FIT-DRIVE: Monitoring devices for overall FITness of Drivers" (Simonetti et al., 2022). The study involved forty driving school students in a real classroom in evaluating and comparing their experiences under face-to-face and distance learning conditions. Wearable devices were used to analyse the students' neurophysiological activities during both modalities and thus gain insights into the cognitive dimension. The analysis of the neurophysiological indicators shows more significant 'cognitive activity', in terms of attention and mental engagement, during the face-to-face lecture than during the remote mode. The analysis of the licensing tests showed worse performance on the questions related to the subjects taught remotely. There is, therefore, evidence of typical behaviour of "disengagement" while attending distance courses, which could compromise teaching effectiveness.

In any case, the study's overall objective was to determine which mode was better. On the contrary, considering the current scenario of the new generations and new lifestyles, the rationale was to use innovative methodologies to investigate and highlight the differences in students' experiences between the different educational modes to define strategies and countermeasures to address possible new global problems. As a practical example, it can be concluded from this study that in the hybrid modes, the interaction between distance learners should be facilitated and encouraged. In the case of hybrid modes, the lesson should be organised in a more significant number of shorter modules, e.g., four 15-minute modules instead of two 30-minute ones, to avoid drops in attention and engagement. For the reasons stated above in the study, theoretical training in driving schools should therefore be frontal. However, instructors should be prepared and trained for possible hybrid class modalities to guarantee a high-quality standard.

Simulators for some specific topics

Novice drivers must be able to drive safely, responsibly, and ecologically. They must apply and master appropriate competence-based manoeuvres. In addition, a requirement based on rules and strategies is necessary to be safe in each specific traffic and road situation and all weather and road conditions. Driving simulators are valuable tools for training, as they can create scenarios that cannot be easily realised in the real world (Wang et al., 2018). EFA does not consider that simulator training is a substitute for on-the-road training. For EFA, simulators can be a valuable and fundamental tool for training in those special driving situations that can only sometimes be easily encountered in

traditional on-the-road training. For example, driving in adverse weather conditions may never occur due to the period in which the new driver is training. In this case, the aid of simulators could be crucial in educating the new driver on the correct behaviour in specific driving contexts.

Annex 3: Quality standards for testing

Liability and responsibility are two concepts that run through all the fundamental stages of driver training because they are part of driver education and respect for the law and society.

Responsibility is also linked to national driving tests and driving examiners. Examiners must respect the law and society and work reliably and transparently (Figure 1). What do these two concepts mean? According to the Oxford dictionary, reliability means 'the quality of being reliable or functioning consistently well'. In contrast, transparency means 'being clear when making decisions and being open to the public about official actions'.

These concepts are closely linked to driving tests and the enormous challenge they represent: to be fair to all.

In this paragraph, EFA would like to highlight the standards for reliable and transparent driving tests and emphasise that increasing the fairness of examinations should be accompanied by measures to strengthen the ability of citizens to act based on general laws if we want to see positive effects on corruption (Lindstedt et al., 2010).

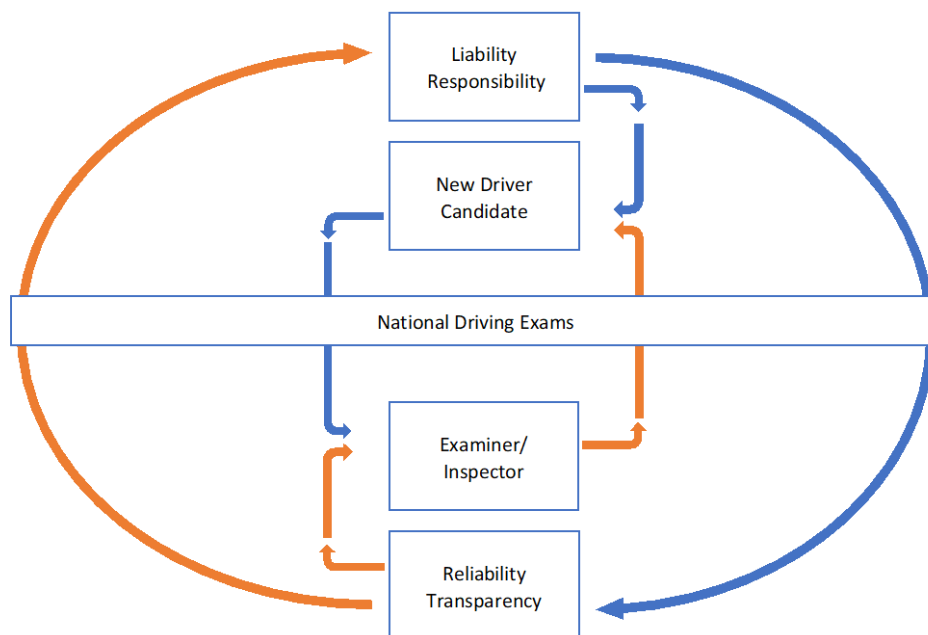


Figure 1: The EFA Matrix and the National Driving Exams

Certification system through technologies (Theory Test)

The test must be done online in a public or private furnished room under the supervision of a public or private examiner. The test questions must be different and sent through a 'National Server Driving Test System'. The candidates must be well separated, and a video-recording system must operate while testing. In addition, an inspector could control, remotely, the fairness of the test execution.

In recent years, cheating during theory exams has been a constantly growing phenomenon in Europe. Control systems have been introduced in several countries trying to contain the phenomenon.

The main problem today is to intercept Bluetooth devices that allow accessible communication outside of the classroom where the exam takes place.

In many cases, it is difficult to isolate the room from electromagnetic waves so that Smartphones or other electronic devices do not work, especially when there are many exam facilities in a country.

The most effective methods currently underway to avoid cheating during theory exams are as follows:

- CCTV camera system.
- Avoid using interpreters for foreign-speaking people, as these people can provide answers that do not coincide with the candidates' answers.
- Reduce the time available for every single answer to reduce the possibility of being able to send the question outside.
- Ensure candidates leave all bags, coats, cardigans, and jumpers outside the exam room in a locker.
- Refrain from making exam questions public, as many European countries are beginning to do.

As already mentioned, a further solution to reduce fraud during the theoretical exams for obtaining a driving licence is to introduce a system of certification of the fundamental topics of road safety using professionals. These topics (shown in the chapter on theoretical training) must indeed be carried out at driving schools or certified bodies. Subsequently, they can be evaluated through a test in compliance with the abovementioned methods.

A method of verifying the physical presence of candidates during the exams can also be done through the QR Code system linked to the candidate's smartphone. It can be helpful to register the presence of students before the start of the theoretical exam.

Hazard perception test

As mentioned in the previous paragraphs, good hazard perception means identifying and responding to potential hazards as safely as possible. Hazard perception skills take a long time to develop, so novice drivers are more at risk of accidents in the first 12 months of driving.

It has been demonstrated that crash risk as a novice driver decreases when the student practises improving hazard perception and gaining more experience on the road. Knowing how to identify and react safely to hazards is an essential life-saving skill that protects everyone on the road.

The hazard perception test is a computer-based test focusing on scenarios where novice drivers are most likely to be involved in an accident. The test assesses the ability to recognise and react to potential dangers in the safest way possible.

Based on the experience gained in some countries, such as Australia and England, EFA proposes that also, in all EU countries, the hazard perception test should be completed before taking the driving test.

Certification system through technologies (Driving Test)

Reliability and transparency must be the starting point of the driving test. One question must be answered to understand better how to obtain a fair driving exam.

How to identify the most appropriate examining body for carrying out the exams for obtaining a driving licence?

Historically public bodies manage the evaluation of candidates. In several countries of the European Union, driving tests have also been delegated to private bodies. Currently the best practices in Europe are the ones in Portugal, France, Croatia, Belgium, Germany and Iceland.

A significant element resulting from international experience concerns the system of carrying out the profession of the examiner.

It is essential that the examiner staff, public or private, carry out their activities with exclusivity. The staff in question must refrain from covering other relevant duties within their employment contract, especially those in contact with the public.

The delegation to private companies for the management of the exams found very positive opinions from the users. It often coincided with a reduction in waiting times for the tests, both in theory and driving.

Annex 4: P2W licensing and training certification at the EU level

Introducing an E-scooter authorisation in case drivers have no AM licences

An e-scooter is a lightweight, battery-powered, stand-up scooter. Accident rate data from European countries indicate increased accidents with e-scooters involved. For example, a Finnish research team investigating e-scooter-related injuries has said their data show a higher rate of e-scooter injuries than other transport modes analysed in earlier studies (Reito et al., 2022).

The legal position of e-scooters differs from one country to another. Based on another research in 18 European countries (FERSI, 2020), e-scooters are legally allowed in most countries involved in the research. For some countries, they are referred to as (electric) bicycles, while in other legislations, as mopeds. These differences lead to consequent differences in the use of e-scooters. For example, there are different rules regarding the maximum speed, the position on the road, the obligation to wear a helmet and insurance.

The law differences between the various countries show that for some EU countries, there is an age limit for using an e-scooter, while for others, there is no. For example, in Austria, a person can use an e-scooter from 12 onwards or only after passing the bicycle test, which usually takes place at the age of 9 or 10. In France, the use of an e-scooter is permitted from the age of 12, as by French law, the e-scooter travels at speed not exceeding 25 km/h. In Germany, the use of e-scooters is permitted from the age of 14. In Switzerland, the e-scooter can be used from 14/15 if in possession of a moped licence, while a driving license is not required from the age of 16. In Denmark, the minimum age is 15 to ride an electric scooter; under 15 years, it is possible to use an e-scooter but under the supervision of an adult and exclusively in the play areas. In Italy, the age limit is 18 unless the person has an AM driving licence. In Portugal, the age limit is 16 years. There is no legal age limit in Finland, but private e-scooter companies impose an age limit of 18. Spain also has no national age limit, but local authorities can set their age limits. For example, Madrid has set a minimum age of 15.

As indicated by the above data, the accident rate of e-scooters is increasing, and the regulations of the various EU countries are not uniform.

EFA supports the education policy for e-scooter drivers by requiring that if a driver does not have the AM license as the minimum requirement, the minimum age is indicated by specific regulations and a special license is established for driving these vehicles.