EAG Peer Review Report – Estonian Transport Administration

December 2024

CIECA Secretariat

TABLE OF CONTENTS

1. INTRODUCTION: OBJECTIVE OF THE VISIT

To enhance its services, Estonian Transport Administration enlisted the CIECA expert groups (the Expert Advisory Group, the Theory Advisory Group, and the Education Topical Group) to evaluate the country's driving testing system and propose measures to strengthen it, as well as the professional skills of those involved in the licensing process for future drivers.

To this end, the CIECA expert groups visited Estonia to observe the practical and theoretical driving tests and to understand the driving education system in the country.

This report examines the strengths and weaknesses of Estonia's driver licensing system, comparing its components with best practices across Europe to highlight potential directions for improvement.

During the visit, some inconsistencies in the driving licensing system were identified. Consequently, the recommendations in this report focus on suggesting initiatives or possible solutions to address these issues.

At this stage, the EAG, TAG, and ETG emphasise that what works well in one country may not necessarily be effective in another. The CIECA experts may draw on experiences and elements from other countries as inspiration, but Estonian Transport Administration must assess the suitability of these elements for Estonia, considering the country's unique social and cultural context and the challenges it faces.

The report also offers long-term recommendations for improving the test. The importance and relevance of these recommendations must be evaluated by Transport Estonia.

2. DESCRIPTION OF THE VISIT

2.1. Agenda

- 24 September 2024:
  - Welcome (introductions) and presentations.
  - Meeting with examiners

- 25 September 2024
  - EAG: Observation of practical tests in Tallinn, Rakvere, Haapsalu, and Paide
  - TAG: Review of the theory test in Tallinn
  - ETG: Visit to driving schools in Rakvere
- 26 September 2024: CIECA Internal meeting

2.2. CIECA Experts Present Participants - Meeting on 26 September 2023

Estonian Transport Administration representatives:

- Risto Kasemäe, Head of the Driving Examination Unit
- Riko Roos, Examination Service Manager
- Mihhail Kotov, Examination Service Manager

CIECA experts

CIECA Secretariat

3. GENERAL INFORMATION

3.1. The Estonian Road Safety Programme for 2016 - 2025

According to the Traffic Act, which came into force on 1 July 2011, the implementation of the state road safety policy is organised through the National Traffic Safety Programme. The current Road Safety Programme for 2016–2025 follows the spirit of the first Estonian National Traffic Safety Programme (2003–2015).

Traspordiamet (Estonian Transport Administration) is responsible for the formulation and the development of the national road safety strategies following the targets set up by the Government. However, it is also important to highlight the close collaboration between the Estonian Transport Administration and other governmental departments (the Ministry of Economic Affairs and Communications, the Ministry of Education and Research, the Ministry of Health, Ministry of Justice), regional and local authorities, research institutions (e.g. Tallinn Technical University, the University of Tartu, the University of Tallinn, Tallinn University of Applied Sciences) and other stakeholders like the Police and the Border Guard Board.

The programme's main objective is to develop a transport system that allows the movement of people and goods in an accessible, convenient, fast, safe, and sustainable manner. It also aims to reduce the number of fatalities (no more than 40 road fatalities per year over a three-year period) and the severity of traffic accidents, create a civilised road environment for users, raise awareness about traffic, and influence user behaviour.

	Estonia
Timeframe	2016-2025
Lead Authority	multidiscipline working groups leaded by the Transport Administration
Targets	
Fatalities	max 40 (as a 3-year average by 2025)
Serious injuries	max 330 (as a 3-year average by 2025)
Baseline Year	Average 2012-2014
SPIs	-

National Road Safety strategy and targets.[1]

To achieve these road safety objectives, the focus is on three main areas:

(1) The "responsible road user who is aware of dangers" area aims to shape precautionary traffic behaviour and attitudes that value the safety of all road users.
(2) The "safe environment" area which includes safer and more efficient traffic that is socially acceptable, environmentally friendly, and considers seasonal traffic characteristics.
(3) The "safe vehicle" area that focuses on the use of safer vehicles in traffic.

The Traffic Act contains interesting pieces of information like the Traffic Rules for Pedestrians, Traffic Rules for Passengers, and Traffic Rules for Cyclists which should be crucial pieces of information for the development of road user education policies. A solid road safety education programme is a key pillar of traffic safety work, and experts were happy to see that there is provision for such early education in schools in Estonia. Unfortunately, pedestrians' fatalities are extremely high in Estonia (around 28.8% of road deaths), and children as pedestrians are one of the most vulnerable groups of road users. It is important that road safety education in Estonia continuous to focus on interventions

[1] *Country Profile: Estonia, European Road Safety Observatory, Mobility & Transport, European Commission, 2024.*

and actions that include direct contact with the target groups, not only children but also teenagers, which is a pre-requisite for the success of any education programme.

3.2. Road safety figures in Estonia

In 2023, a total of 1,725 road traffic accidents involving casualties were reported, resulting in 1,943 injuries and 59 fatalities. This marks an increase of 180 accidents involving casualties (a 111.65 percent rise) compared to the average from 2020 to 2022. As seen before, one of the objectives of the current Road Safety Programme is to have an average of no more than 40 road fatalities per year over a three-year period. However, the data shows stalling progress in reducing road fatalities in the country. The three-year average for the number of fatalities has remained at around 55 for the past three years and that target is slipping out of reach.

	2020	2021	2022	2023
Traffic accidents	1368	1568	1700	1725
Traffic accidents with fatalities	56	40	47	52
Traffic accidents with the participation of drunk drivers	132	133	134	119
Traffic accidents with fatalities with the participation of drunk drivers	12	16	13	14
Persons killed	60	55	50	59
Persons injured	1577	1768	1920	1943

Traffic accidents with casualties on the roads (Table from Statistics Estonia).

A total of 52 fatal road accidents (which includes pedestrians being struck by vehicles) were reported last year. The data indicates no significant changes in road users' behaviour compared to the previous two years, with long-term indicators showing a slight negative trend or stagnation. Road accidents involving a drunk driver resulted in 148 injuries and 16 fatalities, while 17 pedestrians were included in the total of fatalities which amounts to a staggering 28.8% of the registered deaths due to road traffic accidents. The number of accidents involving intoxicated cyclists rose to 66, while those involving intoxicated pedestrians decreased to 15.

The causes of fatal accidents remain consistent with previous years: speeding, drunk driving, overconfidence in familiar surroundings, darkness, winter road conditions, heavy rain, limited visibility, poor use of safety equipment and visibility aids, dangerous manoeuvres, and the physical condition of road users. Highway accidents accounted for 69% of all road accidents.

To improve these records, all stakeholders involved in road safety system in Estonia should continue working together towards common goals to achieve improvements in road safety.

3.3. Background information on the driver licencing system in Estonia

The principles for driver licensing are established in regulation RT I, 28.06.2011, entitled “The procedure for examining a motor vehicle driver, granting the right to drive, and driver’s licence forms and requirements for test vehicles 1”.

In Estonia, a driving licence is issued to individuals who:

- Have their permanent place of residence in Estonia;
- Are of the appropriate age (18 years for a category B licence);

- Possess a valid health certificate (this certificate is also required to begin driving education at a driving school);
- Have completed a driving course and passed the tests administered by the Transport Administration.

Additionally, candidates must not have any active penalties for traffic violations. A penalty remains valid for 12 months following the full payment of a fine for a traffic rule violation. If a candidate has been fined for driving without a licence, they will be eligible to take the Transport Administration tests one year after the fine has been paid.

An official curriculum for driver education has been developed, forming the basis for theoretical education provided in driving schools. Attendance at both practical and theoretical classes is mandatory, with candidates required to complete a minimum of 28 theory lessons and 30 practical driving lessons. The course duration is at least four weeks, meaning candidates cannot complete the driving course in less time. Theory and driving lessons are conducted concurrently.

The training includes two compulsory special courses: a course on driving in the dark and a road safety course (covering driving under slippery conditions in the initial stage). Additionally, candidates must complete a first aid course lasting 16 academic hours.

A provisional driving licence is issued when a candidate passes both the theory and driving exams.

3.3.1. The process to obtain a category B driving licence

(1) Registration in a driving school
The candidate must be at least 15,5 years old. First, the candidate should enrol in a driving school. A candidate can apply for a category B limited driving license in Estonia at the age of 16. Limited driving right gives a person permission to drive a car if a parent with category B license is in passenger seat. A restricted driving license is valid until the age of 18.

According to the law, the duration of the B category study period is at least 4 weeks, but on average from start to finish the learning process takes 4 to 6 months.

(2) Health Certificate
Classes at a driving school can begin after obtaining a health certificate.

(3) Registration at the Transport Administration
The driving school will register the student at the Transport Administration and will issue a learner's form, which allows the candidate to start the classes.

(4) Theory Course
It is compulsory to attend 28 hours of theory classes. Driving school classes begin with traffic theory, covering traffic rules and other curriculum topics. Theory can be studied either in classroom lectures or through an online driving school. If an electronic learning format is used, at least six lectures must be conducted in the classroom).

(5) Practical Driving Lessons
It is compulsory to attend 30 hours of practical driving classes Driving training starts after covering the initial theory topics. The number of driving lessons required depends on the category. The initial training for category B licence includes night-time driving, slippery driving, and first aid courses (26 hours of classes separately taught). These courses are organised by the driving school.

(6) Driving practice with a limited driving licence

When undertaking a driving course, candidates can practise their driving skills with a personal driving supervisor in addition to their driving instructor. The supervisor is an experienced driver who assists in developing the candidate's driving skills. A personal driving supervisor is not responsible for teaching but for supporting a novice driver and helping them practise driving.

If the trainee is under 18, only their parent or guardian can act as their personal driving supervisor. During driving lessons, the candidate must carry an identity document and a learner's form where their driving instructor has authorised them to travel on the road. The supervisor must also carry an identity document.

Drivers who have held a category B driving licence for at least five years can obtain a personal driving supervisor's certificate through the Transport Administration's e-service. The online system conducts a background check and issues an electronic certificate if all conditions are met. Personal driving supervisors must not have any valid penalties for driving while intoxicated or for other violations that result in the withdrawal of the right to drive (such as exceeding the speed limit by more than 20 km/h or running a red light if it caused a dangerous situation).

(7) Driving School "tests"

Driving school studies conclude with "informal" theory and driving tests at the driving school. These tests, although not mandatory, are recommended by the driving schools. The theory test, regardless of whether studied in a classroom or online, is taken in an online environment. The driving test follows the same rules as those at the Transport Administration. Upon passing the "tests", the driving school issues a 'driving school certificate' and forwards its details to the Transport Administration.

(8) Exams at the Transport Administration

The state theory test can be taken after passing the driving school theory test. The driving school send confirmation of the candidate having completed the theory classes, and then it is possible to book the state theory test. Registration for the official driving test is possible once the driving school has sent the driving school certificate details to the Transport Administration.

(9) Getting a Driving Licence

The right to drive is granted on the day the driving test is passed at the Transport Administration, once the examiner has added the details to the traffic registry. The driving licence will be received within ten working days, either by post or at the Transport Administration service bureau.

3.4. Public services in Estonia

Estonia is considered a world leader in the digitalisation of public services. Estonia's adoption of modern information and communication technologies in the public sector and governance has positioned the country as a leader among states striving to modernise their public sector and ensure transparent governance.

Since 2001, Estonia has used an Estonian-developed platform called X-Road, which transmits information in encrypted form for data exchange between registers. The most crucial components of Estonian e-governance are the digital identification of citizens, a digital data exchange layer, and a

layer of applications developed by various public and private institutions. These components collectively constitute Estonia’s e-government ecosystem.

The digital ID, mandatory since 2002, enables secure online communication between public authorities and citizens, as well as private companies. Public authorities and private companies communicate with citizens almost exclusively online, based on the digital identity system embodied in the e-ID – an ID card with a chip and a personal number.

Numerous online public services are available to Estonian citizens and residents, including digital identification, digital signatures, electronic tax filing, online medical prescriptions, and internet voting. These services, driven by convenience, offer significant efficiency in terms of time and money saved for both users and public officials. Citizens expect these services to be provided, and governmental offices view their online presence not as optional but as a strategic and essential part of their daily operations.

Estonia's digitalisation is founded on transparency and decentralised data storage, making it difficult for hackers to attack. Its services are widely used and accepted by citizens as governmental online services are regarded as trustworthy and reliable. Citizens can see what data has been stored about them and who has accessed it at any time. Other countries can learn from Estonia's transparency and the willingness of its citizens to use digital solutions, as digitalisation also requires a population that accepts and uses these technologies.

3.4.1. The Estonian Transport Administration and the Public Services

The Transport Administration maintains a database derived from legislation, known as the traffic register. This database includes information on vehicles and related personal data, as well as driving licences and other documents certifying the right to drive. It is used internally and for public e-services. Through X-road and APIs (application programming interfaces), other parties such as bailiffs, the Motor Insurance Bureau, car workshops, police, and technical inspection points can access the register. Information can be both added to and received from the register. Additionally, databases can connect via X-road, such as linking the traffic register with the population register.

3.4.2. Estonian Transport premises

All premises visited by the experts were calm and bright, welcoming and of outstanding quality and aesthetically pleasing, and extremely comfortable.

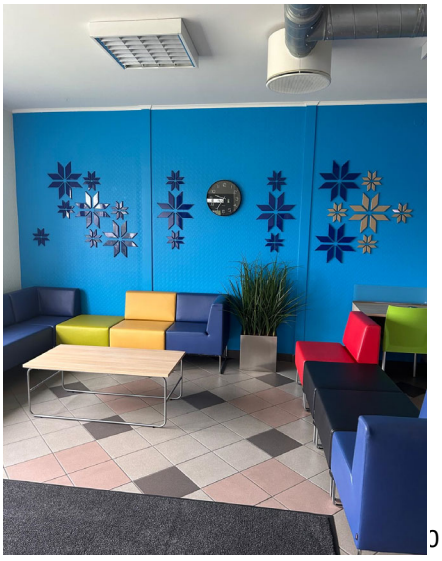


Photo above: premises in Tallinn.
Photo on the right: premises in Haapsalu.

4. THE PRACTICAL DRIVING TEST

4.1. Interesting features in the Estonian driver licencing system

The EAG is aware of certain features that are in place in the Estonian driver licencing system that may have an important impact in the learning process of future drivers, and in the practical test. These are the accompanied driving scheme, and the final phase of instruction of novice drivers.

4.1.1. Accompanied driving

Research in various countries indicates that significantly increasing on-road practice can greatly reduce accidents among novice drivers. Mandatory training alone is often insufficient to achieve the primary goal of Category B driver training. Additional practice with a non-professional accompanying driver may be essential and is in line with the new provisions that will be brought forward by the new European Driving Licence Directive which will provide a legislative framework for accompanied driving from the age of 17 in order to facilitate learning to drive.

Extending the duration of driver training is beneficial for most learners. Spreading training over time allows learners to mature and practice privately between regular lessons and mandatory elements. Learners who take advantage of this feature gain valuable experience, complementing the training received at driving schools, as accompanied driving allows learners to experience diverse traffic situations, helping them become familiar with the road network and the complexities of driving in different conditions, such as varying weather, driving at night, road types, and traffic density.

The more practice a learner gets, the safer they become, which is why EAG members support learning tracks like the ones seen in Estonia which certainly provide opportunities for accompanied driving.

(1) In Estonia, it is possible to obtain a cat B driving licence with limited right to drive between the ages of 16 and 17. To obtain this type of licence, a written consent from a parent or legal representative (e.g., a guardian) must be submitted to the Transport Administration. The minor with this type of licence must be accompanied while driving by a person who should comply with certain requirements. Exams for a limited right to drive can be taken from the age of 16. A driver with a limited right to drive cannot exceed the speed limit of 90 km/h. Their vehicle must display a novice driver’s badge (the 'maple leaf'). This licence is valid until the driver turns 18 and allows driving only within Estonia.

(2) The candidate registers in a driving course at a driving school. Once the driver teacher decides a candidate can be allowed to drive, the driver learner will receive a learner’s certificate (the so-called ‘driving school certificate’) which has no expire date, i.e. is valid for the rest of the learner’s life and allows him to drive with a personal driving supervisor.

(4) The requirement to obtain a personal driving supervisor’s certificate must:

- apply for the certificate through the Transport Administration's e-service;
- be in possession of a category B driving licence for a minimum of five years;
- not have any active penalties for driving under the influence or other infractions that result in the revocation of their driving privileges (such as exceeding the speed limit by over 20 km/h or running a red light if it caused a hazardous situation);

- and must carry the certificate issued by the Transport Administration, which is valid for one year and is issued electronically. If the trainee is under 18, only their parent or guardian can act as their personal driving supervisor.

The online system performs a background check and issues an electronic certificate if all conditions are met.

Recommendations

(1) The requirements for personal driving supervisors do not include any sort of introductory course for accompanying persona. The EAG considers that it is important that a personal driving supervisor understands that his role is different to that of a driver instructor, and that he should be supporting the novice driver and helping them acquire driving practice. In many countries where accompanied driving has been implemented, it is required that the accompanying person follows a short introductory course, in order to understand how they should support learner drivers.

(2) Although EAG experts welcome opportunities to practice accompanied, they would like to call the attention to the issuance of "driving school certificates" to driver learners who pass the driving tests at driving schools with no expiring date. Given the existence of the learner's form given to all candidates when they register in the school, they don't understand the use of this driving school certificate. Any such certificates should always be provisional documents, with a certain validity, and they should be used by learners for a certain period.

The acceptance of this document opens the door to the possibility of driving with this certificate without having to take the official tests, and without having to go through the final phase of instruction for the whole life of the learner driver. Accompanied driving schemes are not put in place to be used permanently, and all learner drivers should build their personal learning path having in mind that they are preparing themselves for the test, understood as a steppingstone in becoming a safe driver.

(3) The accompanied-driving phase should be taken seriously, and it is important to make sure that regular practising really takes place. For that purpose, it would be interesting to develop some type of tool to register the practice sessions (i.e. a logbook) that should be completed by learner drivers and taken to examiners before taking the test. Many countries with such accompanied driving schemes also favoured the development of self-evaluation tools, as this type of learning practice blend itself easily with the higher levels of the GDE matrix.

Many of the countries represented in the EAG have implemented accompanied driver schemes in their driving licencing systems, and they would be happy to provide information to Estonian Transport Administration on their particularities.

4.1.2. Final phase of instruction

As it is the case in the tests carried out by Estonian Transport Administration, the driving test should not be seen as the end of the learning process but as a step within it. For this reason, the EAG welcomes the introduction of the following elements in the driving licencing system:

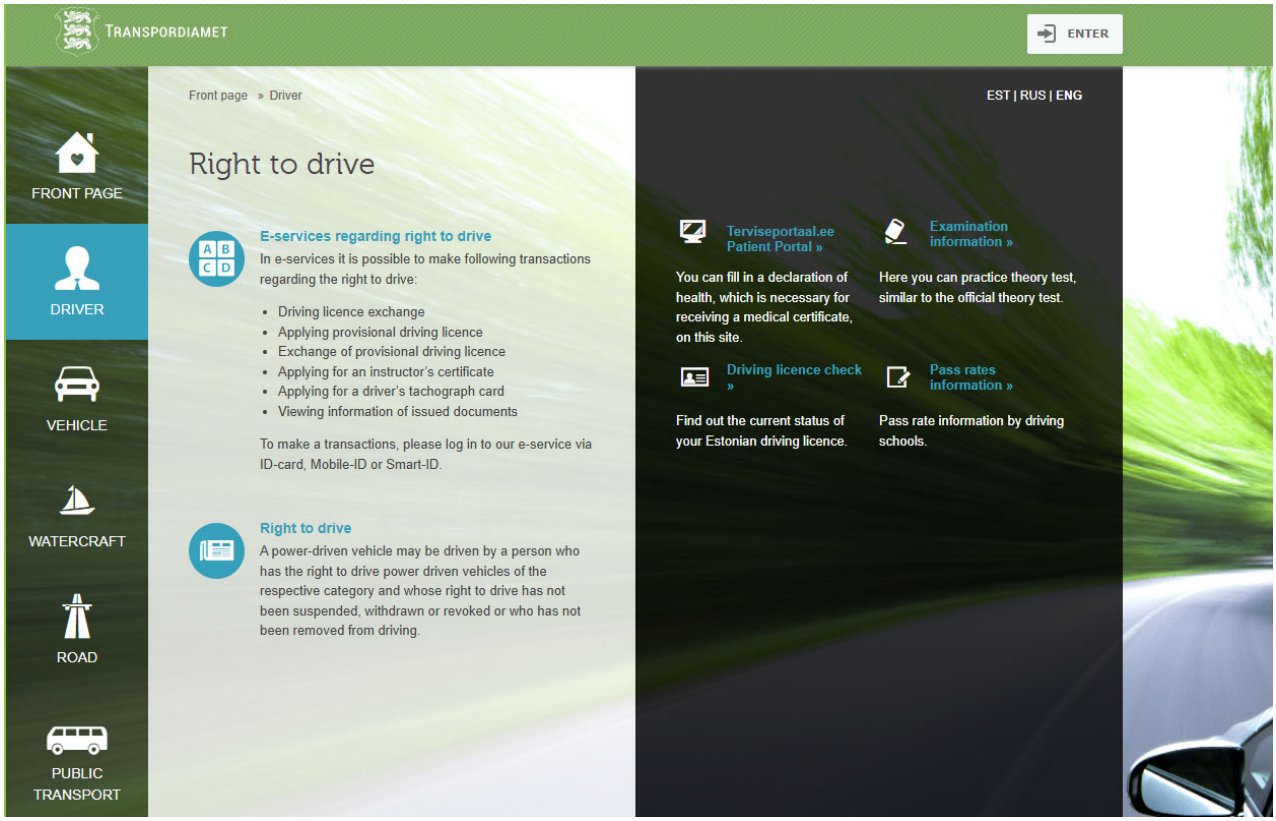
(1) After passing the test and obtaining a provisional licence, novice drivers enter a two-year probationary period during which novice drivers should drive at a maximum of 90 km/h, and their cars should display a novice driver sign. The severity of the offenses committed by novice drivers may entail the loss of the driving licence with the obligation to retake the theoretical and practical exams.

(2) The final stage of initial training starts as soon as the candidate passes the test and obtains a provisional driving licence. To replace this licence for a full one, the novice driver must complete the final stage of training within 23 months since the issuance of the provisional permit which consists of the completion of a slippery road risk avoidance training. The goal of this training is to increase the motivation to drive at a speed appropriate to road and weather conditions, maintaining a safe longitudinal and lateral distance.

EAG experts support both restrictions, and further training for novice drivers. These are positive measures as the general feeling among EAG members is that learners should feel like learners, and restrictions for novice drivers are completely justified. The experts acknowledge that the objective of this stage is to deepen the knowledge and skills obtained in the initial education stage and to achieve sufficient driving experience as an independent driver while gaining self-evaluation skills in real traffic conditions.

4.2. Booking a test

The simplest way to schedule a test is through the Transport Administration's e-service. Additionally, the Transport Administration operates 17 service bureaus across Estonia, allowing candidates to book theory and driving tests at the most convenient location. For instance, candidates based in Tallinn can schedule a test in Pärnu, Viljandi, Kärdla, and other locations.



On-line services offered on-line by Estonian Transport Administration to members of the public in Estonia.

Only Estonian Transport Administration vehicles can be used for category B tests (except those for code 78), so these tests must be booked through the public administration, either using e-services or in one of the 17 service bureaus that Estonian Transport Administration operates across Estonia, where candidates can also schedule theory and driving tests for added convenience. For other categories, driving school vehicles are used, and candidates should schedule their driving tests

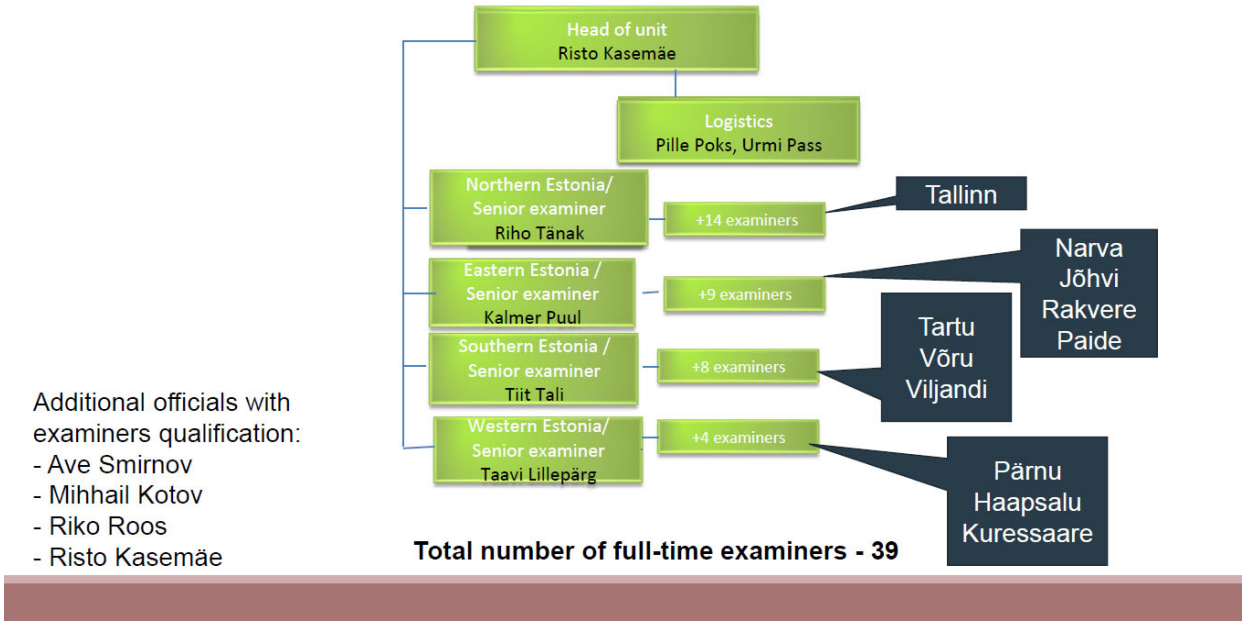
through their driving school. There is extensive information about the booking process on the Estonian Transport Administration website.

The experts who visited one of the service bureaus in Tallinn were very impressed by the comfort, cleanliness, and aesthetics of the surroundings. All services offered at the centre, which include a variety of services not all related to driver licensing, appear to run very smoothly. The agency aims to provide a positive experience for all customers.

4.3. High level of motivation among Estonian Transport Administration staff

The Estonian Transport Administration is responsible for planning the mobility of people and land, water, and air vehicles. It ensures the development of safe and environmentally sustainable infrastructure and creates conditions for safe aviation activities for those travelling in Estonian airspace. Additionally, the administration organises traffic education, participates in policy development related to its field, represents the country in international communications, fulfils international conventions, and upholds the role of the Maritime Administration in global shipping. It also maintains databases resulting from legislation.

During the visit, the motivation and dedication of the Estonian Transport Administration staff were not only noticeable but also commendable. The access to information provided to EAG members, the openness of all staff members, both administrative and on-the-field, and the excellent organisation of the peer review visit, despite the challenges faced by certain officials during the experts' stay, all demonstrate the staff's commitment to improving the licensing system in Estonia.



Driving Examination Unit.

The group generally believes that Estonian Transport Administration staff view the enhancement of the licensing system and the reduction of road deaths as their personal mission.

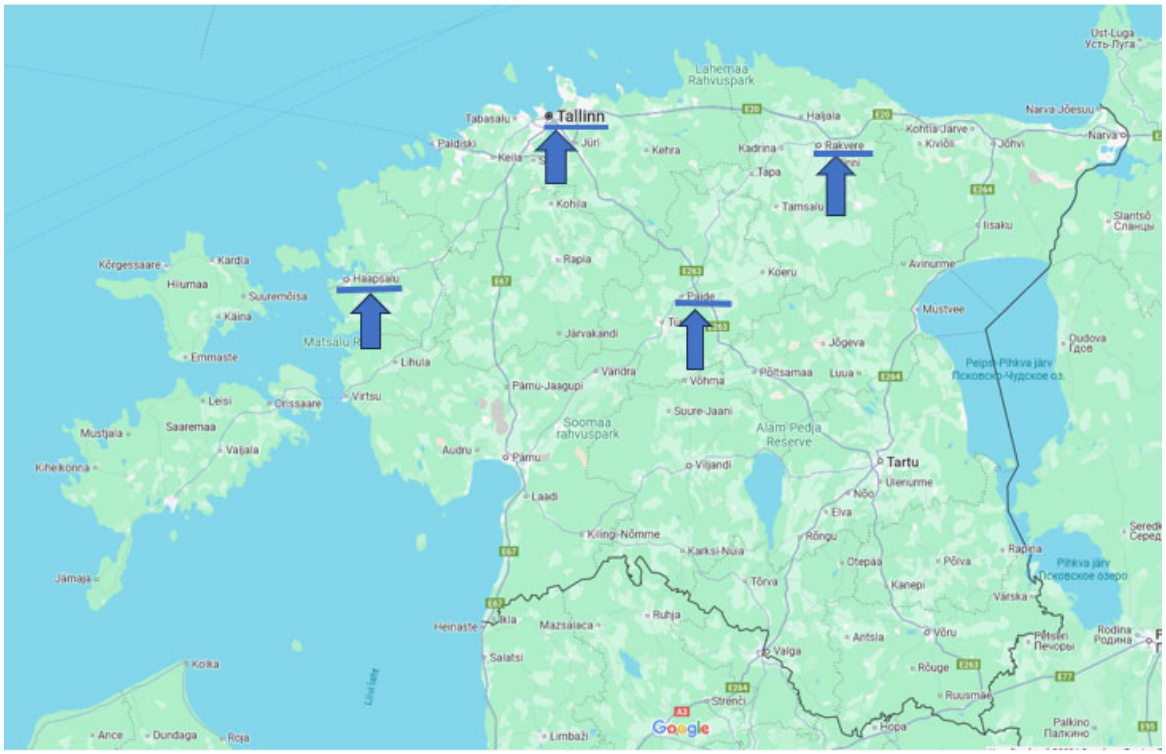
The EAG members hope to share some valuable ideas with Transport Estonia and that their recommendations will contribute to Transport Estonia's efforts.

4.4. The focus of the practical driving test

According to the information provided by Estonian Transport Administration, the practical test is assessed according to competence-based criteria that integrates the higher levels of the GDE matrix. The experts welcome the direction taken by Estonian Transport Administration regarding the focus of the test, but the implementation of such type of testing is very challenging. This type of assessment implies an important shift in the mentality of examiners who need to be supported in their professional task in this move from an error base system to a skills assessment.

The validity of a competence-based assessment lies in the extent to which it effectively assesses the full range of driving competences needed to become a safe driver, i.e. is the practical test in Estonia measuring what it was designed to measure? At the same time, the reliability of the test is also important to ensure that each candidate is assessed according to the same conditions and criteria, regardless of the location or specific examiner in question. Are driving tests in Estonia reliable?

In order to throw some light into these issues, the EAG experts had the opportunity to observe 23 category B tests conducted at testing centres in Tallinn, Paide, Haapsalu, and Rakvere.



Location of testing centres where tests were observed.

4.4.1. The link between the test and the driver education

One of the elements which impressed the EAG experts the most was the presence of the GDE matrix as one of the main inspirations of the Estonian Transport Administration for the exams, and were eager to see how this is reflected in the tests. Having been present in some tests, and although this report includes the opinions of experts from the Education Topical Group (page 38), the EAG would like to provide their insights regarding the link between the exams and the driver education. Many of the problems outlined in section 4.4.2. are intrinsically connected to this issue.

As a general principle, there should be a clear link between assessment and education, with the outcome of one affecting the other: the measure of good training is the pass rate in the test, and

intensive coordination between the training and the test is crucial to produce safe and successful drivers. This means that a good practical driving test should guide the training and candidates' preparations, especially if the content and requirements of the test are comprehensively known to the parties beforehand.

After the test observations, the EAG believes that the connection between training and testing needs to be reinforced. The general impression of all EAG members is that most candidates were not ready for the test, as their driving performances were generally very low. Observations of tests suggested that 74% of candidates failed, indicating that there is a disconnection between the preparation/training of the candidates and what is expected of them in the test. The EAG experts were surprised by the overall results of the tests, noting that some candidates had very poor skills, and that suggest that driver instructors do not prepare candidates for the requirements of the exam. There was little evidence that candidates were benefitting from the lessons taken at driving schools, and many candidates showed a total lack of basic skills in the test.

There appears to be something fundamentally wrong with the way candidates are being prepared for the test. Estonian Transport Administration is testing driver competences according to the higher levels of the GDE matrix. This focus in the test should be accompanied by a driver training education that considers the higher levels of the GDE matrix. However, there is no reflection of such pedagogical aims in the performance of candidates in the tests.

It is necessary to develop a driver training curriculum based in the GDE matrix, properly enforced with adequate quality control measures implemented in driving schools to ensure that candidates are well prepared for the practical driving test. Therefore, a curriculum should contain a detailed description of the training lessons' content and the level of competences that need to be reached to ensure the education of safe drivers. It could also be useful to look at accident statistics and include these critical elements in the training and testing processes.

In short, it is important that Estonian Transport Administration ensures that the education and testing systems share the same pedagogical methodology, and both systems should be supported by a good quality control system.

4.4.2. The practical tests observed by the EAG

A basic outline of the practical test procedures and the obtention of a full driving licence is as follows:

(1) Before the test, at the starting point of the examination, the examiner will check the validity of the identification documents and will inform the candidate about what to expect during the exam.
(2) The examiner assesses the candidate's driving skills during the on-road driving test which lasts 60 minutes in total with a minimum of 35 minutes of net driving, and 10 minutes maximum devoted to manoeuvres. It is conducted on normal streets and roads. When the examiner considers the assessment complete, they will instruct the candidate to return to the testing centre. Once back at the testing centre, the candidate will be informed of the test results.

    The parts of the test are:

    - welcome of the candidate;
    - the safety check: two safety check questions to be answered by the candidate;
    - the completion of three manoeuvres;
    - independent driving by the candidate for a limited amount of time;
    - feedback from examiner and communication of results.

(3) If the candidate passes the test, they will receive a provisional driving licence, valid for two years.
(4) Once the provisional licence is issued, the candidate enters the final stage of initial training, which entails driving independently on the road. During this stage the candidate must display a novice driver's badge (the so-called 'maple leaf') and adhere to a 90 km/h speed limit, even on roads with higher speed limits.
(5) This stage also requires the completion of a 'winter driving course', which must be finished before the category B provisional driving licence expires.
(6) If the requirements for replacing the provisional driving licence have been met, the candidate will be issued a regular driving licence valid for ten years.

As previously mentioned, the EAG experts had the opportunity to observe 23 category B tests conducted at testing centres in Tallinn, Paide, Haapsalu, and Rakvere. They were surprised to see that only 6 candidates passed the test, resulting in a 26% pass rate. This is significantly lower than the average pass rate of 55.8% for category B tests conducted in Estonia during the first eight months of 2024. In short, 74% of candidates, or 17 candidates, failed the tests. The EAG experts generally agreed with the examiners' decisions in most of the tests.

- Some experts felt that indeed some examiners in Estonia applied a holistic approach that considered the global impression during the test, so that small mistakes did not lead to a fail if the overall driving impression was positive. In the same way, when the global impression of the driving during the practical test was bad, the candidate did not pass the test even if no particularly serious mistakes were made. This is a very welcome development in the test, and the experts encourage the Estonian Transport Administration to continue further developing this type of assessment.

- In other instances, the tests felt more error-led, with examiners overreacting to mistakes made by candidates: for example, an examiner made a big deal of a candidate who did not follow correctly instructions given.

Experts did not have information about the amount of time and type of practical training candidates had received (driving school or accompanied driving), but in general, there were no visible differences in the performance of the candidates observed. In some instances, the actions and decisions taken by candidates were difficult to justify after following 28-hour of theory and 30-hour practical compulsory education in a driving school:

- Starting the test with the handbrake on.
- Entering a road where it was not allowed.
- Completing a U-turn in a forbidden place with no visibility.
- Emerging into the path of another car at a junction (the first junction in the test).
- Overtaking a vehicle in a stretch of road where it was forbidden.
- Accelerating while another car was overtaking the candidate's as he was unaware of the presence of this vehicle.
- Difficulties handling the clutch (although this may be due to being unaccustomed to the testing vehicle).
- Not adapting the speed getting close to a pedestrian crossing when child intends to cross the street (the examiner braked).
- Driving too fast over maximum permitted speed.

The main issues observed among candidates, even those who passed the test, were:

- Many of the candidates had problems controlling the car (level 1 GDE matrix).

- The issue of insufficient use of mirrors and lack of observation during the test (level 2 of the GDE matrix) was brought up by different EAG experts. In many instances, there was no focus on effective use of the mirrors, while the candidates responded automatically to the sight of a stop signage or finding their way in roundabouts and were unable to show any anticipation.
- Lack of basic technique to handle the vehicle, especially while performing manoeuvres.
- No compliance with road signs.
- No basic road safety awareness with special disregard to vulnerable road users.

It is important to bear in mind that driving schools all around the world are businesses, and as such, they are driven by commercial interests which in some cases might not work in the best interest of all stakeholders involved in road safety. According to information available online, driving schools charge the candidates between 70 and 95 euros for a practical exam which follows the principles of the official test performed by Estonian Transport Administration. If this is certainly the case, questions were raised by experts: How is it possible that after 30 practical driving classes a candidate could not handle the vehicle at the most basic level and was allowed to take the test?

Based on the available information, driving tests mocking the Estonian Transport Administration's exams are conducted at driving schools as part of the training. When candidates take this test, the driving school issues a 'driving school certificate' and forwards the details to the Transport Administration, allowing the booking of the official test to proceed. This ensures that all candidates arriving for a practical test are endorsed by a driving school, certifying their readiness for the official test. However, experts have observed that many candidates were not adequately prepared for the exam. Driving schools should be discouraged from presenting such candidates for the test, and effective regulations and procedures should be implemented to oversee the activities of driving schools.

In summary, although the test is a means to ensure that certain basic standards have been reached in training, education, and practice, after being present in the exams, the EAG had questions about the content of the training provided to the candidates, or maybe, on the attendance to the classes by the candidates.

Recommendations

(1) Improve the passing rates of the practical test. Better candidates mean better and more effective use of testing resources for all members of the public. In countries where the passing rates have fallen, several initiatives have been put in place to make the public aware of the importance to arrive in the test well prepared to avoid failing:

- Candidates must wait a minimum of 7 days to take the test again in case of failure. Compulsory longer waiting times after failing the test could be considered. It is crucial that candidates who fail the test understand the need of more practice before taking the test again.
- Increase the number of obligatory classes to take by a candidate in case of repeated failure. At the moment, candidates have to go back to the driving school for at least 2 classes if they have failed the test three times. This number of classes may be reviewed.
- Allocation of tests amongst driving schools may be based on number of candidates and passing rates (driving schools with candidates with best results, are assigned more test slots).
- Driving schools should be made responsible for their education outcomes, and the decisions taken in relation to the readiness of candidates to take the exam:

    (1) It is necessary to develop an effective regulation and quality control procedures to supervise the activities of driving schools.

(2) When a candidate engages the services of a driving school to be taught to drive, checking the results of such educative activities in conjunction with the quality of the driving of a candidate should be possible, for example:

- Driving schools should issue a "driving qualification" for the candidates who take the "driving school test" in the driving schools and pass it. This certificate should be sent to Estonian Transport Administration, and/or shown to the examiner before the official test goes ahead.
- Driving schools should also be able to issue training certificates accounting for all the classes taken by the candidate, the tasks being trained in each class, and the learning progress of the candidate. Such register does not have to be too complicated but should be signed by the driver teacher and/or stamped by the driving school. This certificate should be sent to Estonian Transport Administration, and/or shown to the examiner at the official test if the candidate is asked to do so.

(2) Encourage the presence of instructors in the practical test as their presence in the test and during the feedback session at the end has a positive impact at different levels:

- This will allow driving schools to gain more insight into the actual test requirements and enables them to prepare their candidates better. In turn, if candidates have better results in the test, future candidates might feel more prone to attend formal training.
- It also further strengthens the relationship between the candidate and the driving instructor as he becomes a part of the testing process and has an insight into how the candidate performs under test conditions.
- Moreover, in addition to the driving examiner's feedback, the candidate can receive feedback from the driving instructor as well. The presence of the driving instructor can also encourage the driving examiner to assess more objectively.

(3) Candidates must provide a health certificate when they register in the driving school at the beginning of their education journey. However, there were doubts about the eyesight of some candidates as there were some instances in which candidates seem unable to see sign roads, anticipate and react appropriately to the situation. For the purpose of safety during the test, a short eyesight check could be included:

- At the start of the practical driving test the candidate should be able to read (with glasses or contact lenses if necessary) a number plate on a parked vehicle (around 20 metres away).
- If the candidates is not able to read it correctly, he should fail and the test should not continue.
- When the candidate reapplies for the driving licence test, he should be asked for a certificate issued by an optician.

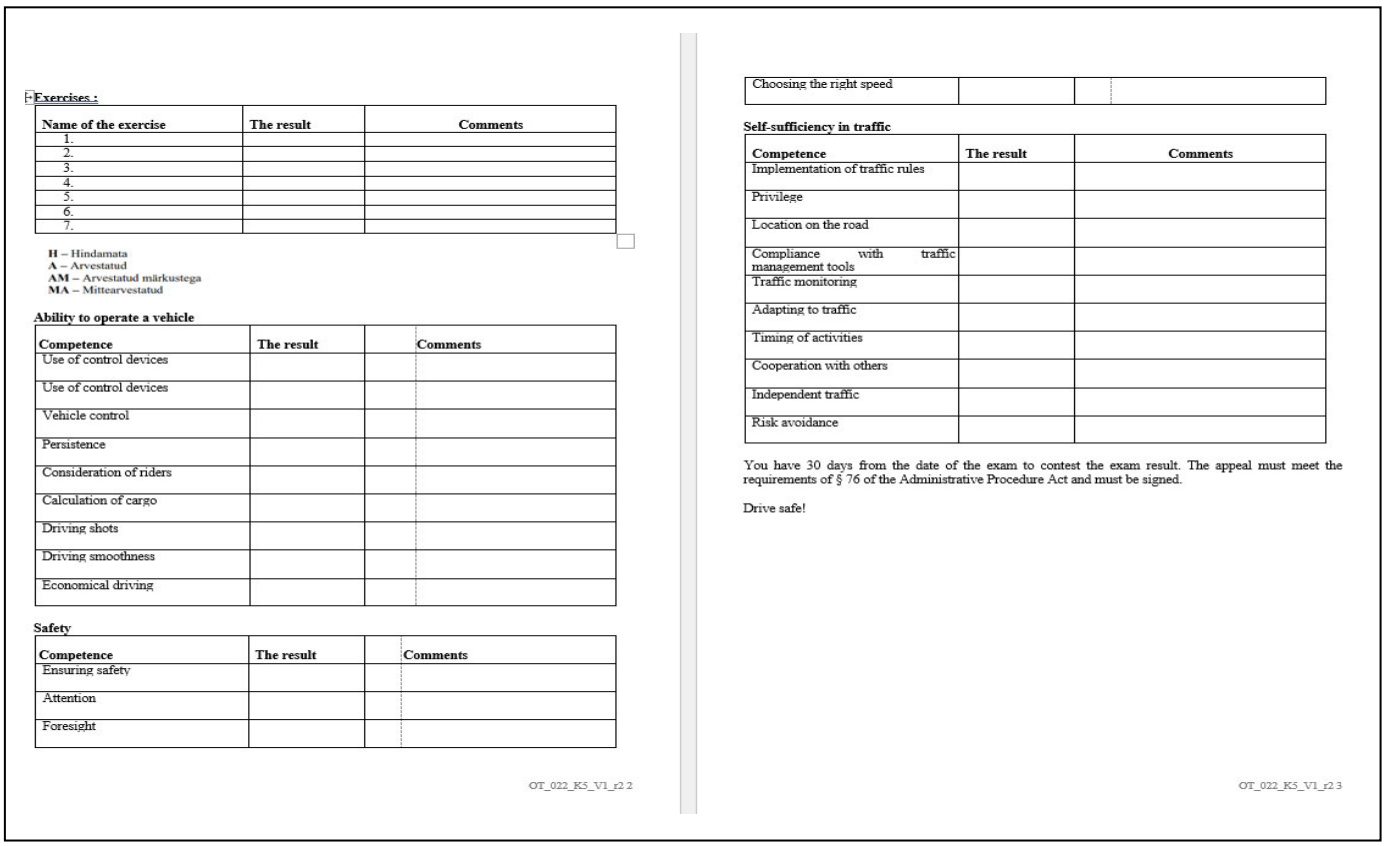
4.4.3. The validity and reliability of the practical test

According to the information provided by Estonian Transport Administration, the practical test is assessed according to competence-based criteria that integrates the higher levels of the GDE matrix, and this is reflected in the exam protocol used by the examiners (page 21). The use of such type of assessment implies an important shift in the mentality of examiners that normally moves from the concept of an error base testing system to that of an assessment of skills of the candidate. EAG members were pleased to see that Estonian Transport Administration is interested in implementing

new technologies to help examiners in their everyday job, aligning with their efforts to improve services in Estonia.

An error-based system often leaves the examiner in an awkward situation where he must defend the faults that he has ticked off in the protocol form instead of promoting the necessary qualities to drive responsibly, safely, and environmentally friendly. It is important that the examiner understands how competences should be reflected in the completion of tasks appropriately set up by him during the practical test. It is also important that the examiner can communicate the root of the failure in the test to the candidate, i.e., where his lack of competence is.

EAG experts acknowledge that some competences are difficult to assess (i.e. situation awareness, self-evaluation, etc.), but, nevertheless, in such testing framework it is essential that novice drivers are encouraged to think for themselves while driving and not being constantly receiving instructions. This would require the candidate's adaptability and concentration (safety) while driving. In addition, he should take into consideration the situation of the road, weather conditions, other traffic, the interests of other road users (especially vulnerable road users) and to always be fully alert. The goal is to make the exam believable and more real, and to try to assess the competences in the higher levels of the GDE matrix.



Exercises :

Name of the exercise	The result	Comments
1.		
2.		
3.		
4.		
5.		
6.		
7.		

H – Hindamata
A – Arvestatud
AM – Arvestatud märkustega
MA – Mittearvestatud

Ability to operate a vehicle

Competence	The result		Comments
Use of control devices			
Use of control devices			
Vehicle control			
Persistence			
Consideration of riders			
Calculation of cargo			
Driving shots			
Driving smoothness			
Economical driving			

Safety

Competence	The result		Comments
Ensuring safety			
Attention			
Foresight			

OT_022_K5_V1_r2 2

Choosing the right speed			

Self-sufficiency in traffic

Competence	The result	Comments
Implementation of traffic rules		
Privilege		
Location on the road		
Compliance with traffic management tools		
Traffic monitoring		
Adapting to traffic		
Timing of activities		
Cooperation with others		
Independent traffic		
Risk avoidance		

You have 30 days from the date of the exam to contest the exam result. The appeal must meet the requirements of § 76 of the Administrative Procedure Act and must be signed.

Drive safe!

OT_022_K5_V1_r2 3

Protocol used in the practical test in Estonia (translated by Estonian Transport Administration).

This concept of driving test should encompass the following elements:

- Meaningful amount of time in the test spent driving independently by the candidate, as independent driving implies that the candidate must make a responsible choice based on his skills and the requirements of the tasks. During the tests, independent driving entails the creation of circumstances in which the candidate must show his driving skills without the help or instructions of the examiner.

4.4.3.1. Independent driving in the test

To implement independent driving in the practical test, a balance must be struck between giving the candidate enough freedom to feel responsible for their own driving (validity) and maintaining enough control and structure to ensure the test norms are observed (reliability). There is an inherent contradiction between having in place a competence-based test and the absence of meaningful independent driving, and the EAG experts would like to encourage Estonian Transport Administration to develop the test a bit further as integrating the GDE-matrix, i.e., implementing a competence-based assessment, requires including real independent driving in the test. Candidates must assess situations and make decisions in real traffic conditions by themselves.

Driving independently means the learner or candidate no longer relies on prompts, cues, or instructions from the instructor or examiner. At a minimum, the driver should be able to travel at an appropriate speed for the conditions and maintain adequate safety margins with other road users. Additionally, the driver must be capable of safely navigating from point A to point B by following signposts. This requires essential skills beyond those currently tested in Estonia.

Independent driving implies that the candidate must make a responsible choice based on his skills and the requirements of the tasks. In the tests observed, the independent driving in the tests did not "feel" independent:

- Experts are not sure of the instruction given to the expert to start driving independently, but the general impression among experts is that it may have been along these lines: *"follow this sign until I tell you something else*". The candidate was not making any real decision.
- The feeling of all EAG experts during the observations is that the candidates observed did not have the opportunity to drive independently for a meaningful amount of time, as this part did not last even 10 minutes, and it was felt that that the responsibility of the test was left entirely to the examiner.

- There were no clear standards for this part of the test: candidates drove independently for different amounts of time in different tests, and there was not consistency in the elements encountered by candidates although most of candidates drove in very easy straight roads.

It is crucial to understand that while the candidate is driving independently, he must make all decisions independently. The examiner sets the tasks and evaluates whether the candidate is ready to drive independently on the road. The EAG stresses that novice drivers should be encouraged to think for themselves while driving, rather than following the examiner's instructions during the tests. Examiners should understand the importance of assessing cognitive learning targets (e.g., planning, decision-making). The most effective way to let candidates show their competences is by allowing them to drive independently. The goal should be to make the exam realistic and to assess driving competences at the higher levels of the GDE matrix which is indeed the objective of Estonian Transport Administration. On these issues, the experts provide several recommendations:

- The goal of integrating independent driving in the practical driving test is to ensure this concept is addressed in training. Proper training and practice are essential for preparing learners for solo driving. For test-led education systems, which is the underlying system in Estonia, the most effective way to ensure independent driving is covered in training is to add it to the test and make it clear that the candidate's independent driving performance will be considered in the pass-fail decision.
  Some countries with obligatory on-road training, such as Finland and Norway, integrate independent driving in the driving lessons preceding the test. This phase moves beyond mere

vehicle control and traffic rules to prepare novice drivers for real-life scenarios they will face in the first few months of solo driving.

Various coaching techniques and methods can be used by the instructor throughout the driver training process to give the learner a stake in the training and instil a sense of responsibility. These techniques are being collected and developed within the EU HERMES project.

- It would be better, in the opinion of the experts, to take advantage of the opportunities offered by the flexibility of the driving licencing system built by Estonian Transport Administration, like the accompanied driving schemes, and increase the net time for independent driving during the test (for example, handling the manoeuvres as suggested above). This approach would need, as mentioned before, a revision of the role and teaching methodology of driving schools. However, the experts feel that the final goal for Estonian Transport Administration should be the implementation of tests where candidates can drive truly independently.

- In all observed tests, the examiner gave instructions before every action taken by the candidate, meaning the examiners were completely in charge of the exam. Making the driving test more realistic, for instance, by having the candidate follow signs to the railway station, gives examiners better insight into the candidate's core driving skills. This is beneficial for two reasons:

  (1) The candidate has to 'multi-task' to a greater extent: finding their way is an additional skill that must be performed alongside core driving skills such as positioning and speed. If the candidate's core driving skills are not sufficiently automatic, this weakness will be exposed when the additional skill of orientation in traffic is added.

  (2) Removing the constant stream of instructions from the examiner means the candidate cannot use these instructions as a 'cue' to spur them into action (mirror, indication, positioning, speed). The candidate must decide on the timing of their actions independently and without external support. In test-led systems, where the content of the test dictates what is taught in training, integrating 'independent driving tasks and concepts' into the test is likely to influence how the learner is prepared.

- Making sure that at least 10 minutes of independent driving really take place, as increasing time for independent driving in the test encourages the candidate to find and show his natural driving style.

- At the beginning of these 10-minute independent driving during the test the examiner may either tell the candidate to drive to a specific destination, and then say nothing until the destination is reached. The candidate must therefore follow signposts, look in the mirror, adapt speed and change position without any form of support or cue from the examiner. This demonstrates the candidate's ability to plan their driving and make decisions independently.

- Allowing the candidates to choose entirely the area where he should perform the manoeuvres during the test would increase the amount of independent driving in the test. Manoeuvres should be carried out on roads where the candidate must consider other traffic, when to stop, where to stop, indication, constant observation, etc. More information about this will be given in section 4.3.3.3.
- The introduction of Satnav (GPS) in the test as a compulsory element should be considered.

- When the test approaches its end, the examiner may ask the candidate if they know how to get back to the testing centre. If so, they could return by themselves and finish the test by parking the car.

- Include real-life driving tasks in the test that the candidate must solve using their own resources. Instructions from the examiner could be similar to: "Get out of the parking lot and turn right at the traffic light. Then follow the road signs towards the airport (or city centre)." Later, the candidate can take on new driving tasks, such as following directions to new goals, turning back, or finding a place to park. The essential point is not that the candidate succeeds in completing the independent task, but that they continue to drive safely and responsibly despite the extra element of 'multi-tasking'.

4.4.3.2. Test length, testing routes & the assessment of eco-driving

According to regulations, which comply with the requirements listed in the 2nd Driving Licence Directive (Annex II, paragraph 10, length of the test), the duration of the practical driving test and the distance covered in that time must be sufficient to assess the skills and behaviour provided for in the qualification requirements.

Meeting, identification	Intro	Driving in urban environment	Driving in rural environment	Exercises	Conclusion
1-2 min	5 min	~20 min	~15 min	10 min	5 min

On paper, this duration should be sufficient for the examiner to assess the candidate in various situations, such as driving on highways and outside built-up areas.

However, the EAG shows concern about the length of many of the tests, especially those failed by the candidate as they were cut short with candidates instructed to return immediately to the testing centre. The experts would like to see this practice stopped (provided the candidate's driving is not dangerous) so that candidates are given the opportunity to continue driving even if they have already failed. This allows them to receive feedback on all aspects of their performance, helping to identify additional weaknesses to focus on before retaking the test. The failed test becomes an opportunity to gain valuable experience as candidates improve their understanding of the requirements of the test, and what is expected from them.

However, it is true that some candidates demonstrated such poor skills that some EAG experts felt there was no point in continuing the test after 10 minutes. Driving schools should be discouraged from sending such candidates to the test.

It is crucial to make sure that the selected routes in the test allow for the testing of a number of competences, in especial the capability to adapt to traffic conditions depending on the type of road, and traffic density. The driving tests routes are selected by examiners, and they include good testing elements that go through urban areas and outside of built-up areas and provide flexibility to test the candidate in a number of situations: the ideal environments for candidates to drive at different speeds, and to demonstrate their ability to negotiate the use of the road with other drivers. However, regarding this topic, the experts highlighted the following:

- The speed limits set up in the Estonian traffic act § 15 are: 50 km/h in built-up area; 90 km/h on roads outside built-up areas; and 110 - 120 km/h on selected roads depending on the time of the year, and the existence of electronic speed signs on the road. However, the

overall speed observed in most tests was too slow, and this factor was aggravated as the roads in many of the tests (like the tests in Haapsalu) were generally empty, with both the candidate and the examiner rarely checking their mirrors.
Even the best candidates did not drive at more than 90 km/h. Experts understand this is due to the limitations in place for novice drivers who, for the following two years after getting the licence, are not allowed to drive at higher speed. However, the experts believe candidates should be able to drive at higher speeds during the test.

- In some instances, the traffic, or lack of it, made the assessing of skills of the driver quite difficult as there was no traffic at all in the roads, and it was difficult to assess the navigation skills of candidates interacting with other vehicles.

- Most candidates were driving at a maximum speed of 40 – 60 km/h for the most part of the test ignoring the maximum allowed speed in some roads, unable to adapt to the conditions of the road and the traffic. It is not clear if this responds to instructions given by the driver instructors to the candidates.

- In some instances, candidates were simply unable to handle the car at the most basic level, and therefore were unable to reach more than 30 – 40 km/h. The situation was extreme in some tests when, even in 90km/h roads with no traffic candidates kept driving at a speed of around 40 – 50 km/h. It is difficult to assess the performance of any candidate driving at such speed and in such conditions, and the test lacks any real purpose.

Some of the issues mentioned above in this section, e.g., limitations of the test routes, candidate's speed, and lack of anticipation skills, are at odds with eco-driving, and the EAG would like to note that:

- No real use of the 5th gear could be observed during the tests,
- The use of low gears and late braking was a common element in the driving style of several candidates, and
- Many candidates were unable to look far ahead and anticipate in traffic which in turn contributes to safe driving, and to avoid stops.

These circumstances made difficult to assess eco-driving in the test. On other instances, when candidates were driving on roads where speed could reach 90 km/h, most of the candidates kept driving at 40 - 50 km/h, with the testing vehicles becoming obstacles in normal traffic (if there was traffic at all).

Recommendations

(1) The EAG recommends that candidates continue driving for the full duration of a standard test, even if they fail early on. It is common practice in most CIECA countries to continue the assessment (provided the candidate's driving is not dangerous) to give candidates the opportunity to keep driving, even if they have already failed. This allows them to receive feedback on all aspects of their performance, helping to identify additional weaknesses to focus on before retaking the test. From a customer service perspective, the exam meets the candidates' expectations as they receive the service they have paid for. Therefore, the following instruction, found in the Estonian Transport Administration website, should be changed along these lines:

"The examiner concludes the practical driving test as soon as possible if they see that the preparation (knowledge, skills and behaviour) of the examinee do not support a positive assessment and if the candidate's driving is dangerous"[2]

(2) As the European and Estonian legislation clearly state, it is important that candidates are tested under different circumstances so they can demonstrate that they are able to handle by themselves the vehicle in a variety of real traffic conditions. Speeding is also one of the main causes of accidents in Estonia, and candidates should be able to demonstrate how they can handle the car at higher speeds. The low speed in the test may respond to a general instruction given by driving schools to candidates, but it is an issue that should be addressed urgently. Keeping speed in the test at such low levels, provides no obvious advantage for road safety in the long term as they will have to drive in the real world as soon as they get their licence (when passing the test). Being as it may, candidates should drive at higher speeds during the test, even if novice driver will have restrictions in place after receiving their licences, and the examiner should make sure that this is an element included in all tests. Maybe this restriction should be reviewed so examiners have a clear idea about the skills of the candidate when handling the car at higher speed for the purpose of the test.

(3) Increasing the time of independent driving in the test would bring diversity in the routes, and would enrich the content of the test, making it a real driving experience.

(4) The experts believe that, by changing some elements in the test, eco-driving could be better addressed and assessed during the test.

4.4.3.3. Manoeuvres

During the test, the candidate must complete three exercises, and although the number of attempts to complete them is not limited, candidates are given a maximum of 10 minutes to complete them:

- U-turn in forward or reverse gear (mandatory).
- Parking with a manoeuvre (mandatory).
- Parallel parking or reversing in a small area (optional, the examiner selects one).

All experts shared the same opinion: this element in the test is extremely unrealistic, and the way manoeuvres are performed are at odds with the goals of the GDE matrix. When performing the manoeuvres, the same types of errors seen in other parts of the test were observed:

- Many of the test started with the car facing inwards, requiring the candidate to reverse out to get out of the testing centre.

  As it happened in one of the tests, the candidate had to reverse at the start, complete three compulsory exercises, and then park at the bay at the end of the test, means five manoeuvre exercises were completed in the test.

  In another test, the candidate had to reverse to start the test, and this may have been the first time the candidate drove this vehicle. The candidate drove some distance out of town before stopping to complete a U-turn. This exercise was completed with no clear parameters, just grass on either side of the road, with nothing to prevent the candidate from accidentally driving into the field.

[2] *https://www.Estonian Transport Administration.ee/en/practical-driving-test#assessment-of-practi, accessed on 27 November 2024.*

- A candidate with 100 hours of driving practice in a driving school was unable to steer the vehicle easily, lacked vehicle control, and failed to gather sufficient information for decision-making (lack of mirror and visual checking) during the manoeuvres.

- One of the tests started with the car facing inwards, requiring the candidate to reverse out into the car park.

- Examiners seemed obsessed with candidates parking exactly in the centre of bays, getting the candidate and themselves in and out to check if the vehicle was correctly parked, using valuable time, and sometime disregarding basic notions of road safety, getting out of the car without checking several times during exercises.

  The reverse park exercise in one of the tests had the pupil standing in traffic to see if the car was positioned correctly. The examiner then also got out of the car to check, leaving the engine of the car running. The assessment of manoeuvres should be made from inside the car.

- The experts felt there was ample opportunity to complete the exercises using less time, thus saving time that could have been used driving. If a candidate takes 5 minutes to park, this means he has not the necessary competence for the completion of the task.

- In most of the tests, the locations where manoeuvres took place didn't have any value. The conditions to park in empty roads or quiet parking lots in supermarkets do not emulate real driving conditions.

Recommendations

(1) EAG members believe that manoeuvres should be conducted on public roads, as performing them outside real traffic conditions, as seen in Estonia, makes this part of the test unrealistic. The experts felt there is a need to review how manoeuvres are tested and consider changing this element of the test. The conditions in Estonia allow for further development of the test by enabling candidates to perform manoeuvres when and where they deem appropriate, thus making their own decisions.

(2) Implementing this new testing requirement could be approached as a small separate project as part of increasing the presence of meaningful independent driving. This could involve incorporating manoeuvres that blend naturally with the driving assignment given to the candidate.

The examiner should make clear to the candidate that a certain manoeuvre should be performed but should leave the decision to the candidate as to when and where to perform it. Manoeuvres should be carried out on roads where candidates must consider other traffic, decide when and where to stop, indicate, and maintain constant observation. The examiner could then evaluate the appropriateness of these decisions.

(3) Alternatively, specific roads appropriate for performing the manoeuvres in a meaningful way should be identified and used by the examiners. The tasks to be completed in the test should be challenging and should check the candidate's ability to drive and react in "real" traffic conditions: e.g. parallel parking should be performed with traffic.

(4) The manoeuvres do not need to be timed. Time does not add any value to the test. One of the examiners noted that only about 2 out of 100 candidates exceed the time limit. Timing factors impact the fluidity of the manoeuvre and the actions of the candidate, who becomes more concerned about the car's position than the overall execution. This would also increase the amount of net driving time in the test. Excess time does not have an added value, and it actually takes the skill away.

(5) Instead of limiting time, the EAG recommends limiting the number of attempts, e.g. to two attempts per manoeuvre. For this, it is necessary that the expected (correct) behaviour and the error criteria are clearly defined.

(6) EAG members showed concern over road safety awareness in some of the manoeuvre's tests which should be assessed from inside the car. The examiners should avoid any situation in which the candidate or himself interfere with normal traffic when getting out of the vehicle. Road safety should always be a concern during the test, and examiners' attitudes should be an example to follow by candidates.

4.4.3.4. Testing vehicles

Most of driving tests for category B (passenger car) are conducted using vehicles owned by the Transport Administration. Owning the fleet of testing vehicles allows for the installation of additional tools, such as cameras, which is used for recording the tests.

The administration uses KIA Ceeds with petrol engines, which are in very good condition, providing a clean and safe tool for the tests. Estonian Transport Administration maintain high standards in the vehicles, and this reflects an awareness of the clear connection between a well-kept fleet of vehicles and the level of road safety in a country. This is a good policy as it conveys the idea that the condition of a vehicle is strongly connected to the safety of drivers, passengers, and other members of society.

Testing cars used in the practical tests in Tallinn.

Some driving school cars observed at the testing centre in Tallinn were similar to those owned by Estonian Transport Administration, meaning some candidates may be familiar with the testing vehicles. However, this gives a disadvantage to the candidates who step into the car for the first time for the purpose of the test. Some of the problems observed regarding the handling of the car (the clutch, the lack of fluidity when completing the manoeuvres, etc.) could have arisen because of this.

There were some issues observed in related to the vehicles in the test:

- While Estonian Transport Administration testing vehicles can be easily identified, driving school cars do not use any special signage when they are used for driving tests. This could mean that candidates may receive different treatment from other car drivers during the test.

- The engine was left running as the examiner gave the debrief at the end of the test.

- The vehicles are equipped with ADAS, that are allowed in the test, but their use was not assessed in any of the exams observed.

- In one test, a driving school was used. The examiner placed the portable camera directly in front of the pillar airbag.

Recommendations:

(1) In the interest of fairness, and reliability, all cars in all testing centres should be facing outwards at the start of the test or should be parked without the need to perform a manoeuvre at the start of the test. This circumstance can even have a bigger impact in the performance of a candidate who has never driven a similar car before the test.

(2) The question about using the vehicles owned and operated by the authorities may be appropriate. While it may be beneficial for ensuring that the vehicle standards are adequate and equipped with the necessary technological features, it could also be a disadvantage for candidates taking the practical test in an unfamiliar vehicle. Despite candidates being given 5 minutes to familiarize themselves with the car, which is not considered a negative, it remains a completely unfamiliar vehicle for them. Should other options be considered to provide candidates with the best possible conditions for the test?

(3) The engine of the vehicles should not be left running after the test is finished. It gives a bad example for candidates.

(4) If driving schools' vehicles are being used in the test, make sure that they are properly identified, so the treatment from other road users would be the same as for those taking the exam in Estonian Transport Administration vehicles.

(5) Develop clear procedures for the placement of the portable cameras in driving school cars having into account road safety standards.

(6) The EAG encourages Estonian Transport Administration to fully utilise testing vehicles equipped with ADAS (Advanced Driver Assistance Systems) and to develop the test to include their evaluation. This would align with the increasing presence of such technology in modern cars and address the needs of current and future drivers. Integrating the necessary knowledge and correct use of such systems into novice driver education and testing is essential for adequately preparing future drivers.

During the initial conversation on day one, it was noted that driving schools are hesitant to incorporate ADAS into their training. There is a misconception among some driving instructors that "the smarter the car, the less I have to train." The EAG believes there is significant work to be done in this area, as the prevailing opinion among experts is entirely contrary to this statement.

The EAG experts advise that driver training programmes should include educational modules on these systems. This would enable learners to understand how to use ADAS effectively, be aware of their limitations, and importantly, help new drivers cultivate a deeper understanding of safe driving habits and risk factors, thereby enhancing their safety awareness. This includes, for example, understanding the importance of adhering to speed limits, staying alert, and being mindful of other road users.

Incorporating these elements into driver training can contribute to the creation of safer and more knowledgeable drivers. It is crucial to remember that while ADAS can support drivers, they do not replace the need for good driving skills and attentiveness on the road. Hence, comprehensive driver training remains a vital aspect of road safety. This also means that young drivers need to know whether an ADAS is intervening correctly or incorrectly to be able to react safely.

Especially the use of Systems of Level 1 and 2 (SAE classification system) is accompanied by a fundamental change of the requirements for completing the driving tasks. The candidate must show that he uses the system in adequate situations and that he has understood the necessary monitoring and that he is prepared to override the system all the time. Therefore, during the test drive, the one-time use of one to two systems (preferably one each for longitudinal and lateral guidance) of Level 1 or 2 is useful for road safety in future.

It is important for Estonian Transport Administration to develop guidelines promoting the testing of ADAS and to adequately inform driving schools of this development. The EAG has created a set of Guidelines for the Conduction of Practical Tests in Vehicles Equipped with Advanced Driver Assistance Systems (currently being updated and available on the CIECA website) that could assist Estonian Transport Administration in this matter.

4.5. Examiners in the test - Consistency in standards

All driving examiners in Estonia are civil servants employed by the Estonian Transport Administration, and their responsibilities are mainly the conduction of the driving tests. At the moment, there are 39 examiners and 4 additional officials with examiner qualifications.

Estonia, as the rest of Member States of the European Union was faced with the need to transpose Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on Driving Licences into national legislation. EAG members were happy to see the implementation of the 3rd Driving License Directive that imposed additional requirements for driving examiners. This directive provides a route to follow for all European driving licencing authorities.

Among the measures imposed by Annex IV of the Directive was the obligation to introduce minimum standards concerning the entry to the profession of examiner and the introduction of a quality assurance system which would help to improve the quality of the exams and the best service for customers. The EAG are happy to see both systems implemented. There are legal requirements to become a driver examiner, and they are set in the Traffic Act § 122, Ministerial Decree of 25 February 2011. On another hand, the Ministerial Decree §14 states the qualifications and education needed to become an examiner in Estonia. Examiners should know about main principles of driving education, road safety and traffic regulations, procedures for the issuance of a driver’s licence, knowledge of the examination process, and further issues related to vehicles and first aid.

It is worth noting that the continuous assessment of examiners developed in Estonia is integrated into a Quality Assurance System which includes criteria and measures to follow if minimum requirements of any aspect of the examiner requirements are not met. Examiners' professional performance is assessed by their peers, either in person during a test or through test recordings. If an examiner fails the evaluation on the first attempt, they are given a second chance. Failing the second attempt results in the revocation of their examiner's licence. They then have one week to refresh their knowledge and requalify by completing the same tests and tasks as the initial qualification. If they fail again, they lose their examiner's rights permanently. Other factors considered in this evaluation are the feedback from the customers, and the number of cases in which his decision was changed due to appeals.

The first point to highlight is that while comparing their experiences on the observation of the tests, the standards among examiners do not differ greatly, although there were some differences that may affect the reliability of the test. The driving tests observed followed procedures very similar to the rest of CIECA countries.

A nice touch is the use of the uniform among examiners which helps to give a sense of uniformity in the procedure.

The EAG would like to highlight how the recordings have become one more tool to ensure the quality of examiner standards, being used to inspect the work of examiners or evaluate their competency, apart from also being used to settle appeals of the results of the test.

Recommendations

Additionally, the performance of the evaluation of the examiners by an external authority could be considered as it would stress the independency of results and could enhance the quality of such evaluation.

4.5.1. The atmosphere during the test

The behaviour of the examiner during the test significantly impacts the candidate's ability to concentrate on their driving. Candidates should be able to focus entirely on demonstrating their driving competence, and the examiner should facilitate this. Therefore, it is crucial for the examiner to create a relaxed atmosphere that allows candidates to perform at their best. This is essential given the purpose of the driving test, which is the final assessment for candidates to prove they can drive independently in traffic. Candidates are aware that mistakes will not help them pass the test, and a retest involves additional costs and inconvenience. Moreover, in stressful situations, there is a risk that making mistakes can lead to further errors.

Most examiners at the Estonian test took this into account, reassuring candidates by explaining what was expected of them and helping them focus on the test and their performance. This general attitude is without a doubt the reason for such a high average recommy index which in fort he first eight months of 2024 was of 74.6%. In short, the behaviour of most examiners was extremely professional and of very high standards.

However, two EAG members noticed how one examiner did not share this approach. He made no effort to assist a candidate who was clearly extremely nervous and kept stalling the car. Once the test finished, the examiner took a long time to explain the mistakes to the candidate, but by that stage, the candidate was not listening as he was angry and frustrated with himself.

Recommendations

All examiners should adhere to the guidelines to create a comfortable environment for conducting the test.

- Examiners should welcome candidates to the test and, if they fail, encourage them to return for the next test. Being overly strict does not benefit anyone involved in the testing process.

- Always explain to candidates what is expected of them.

- Examiners should always make an effort to break the tension in an exam and help candidates to calm down to make sure the best conditions for the candidate to excel are in place.

4.5.2. Safety check

At the start of the driving test, the examiner asks two questions about the safety and operation of a vehicle. The candidate must answer both questions correctly. The list of possible questions is available for all candidates.

- Although a brief technical check should be carried out before the exam, the technical checks observed by EAG members were repetitive, and carried out inside the car, without real involvement of candidates.

- After reading the questions, experts realised that most of the questions to be answered by the candidates can be answered inside the car, and the type of action requested to the candidate is “to turn on”, not to check if a certain piece of equipment in the car is working.

- The number of safety questions made to candidates varied. In some tests, no safety checks were performed, while in other, the two prescribed questions, or three or four questions were posed to candidates.

Recommendations

(1) For the sake of reliability in the test, standards should be followed by all examiners, and the same number of questions should be made to all candidates.

(2) EAG recommends the introduction of a thorough safety check to be carried out more independently by the candidate before the test so that he can demonstrate how he would carry out basic checks and maintenance to make sure that the vehicle is safe for use. The safety check should be varied, with changing questions that could be listed and selected randomly from the tablet.

This could contribute to transform the test into something more connected to the real experience of driving autonomously and could also be linked to the inclusion of manoeuvres and driving tasks handled more independently in such a way that instructions from the examiner should not be necessary. These are some examples that could provide inspiration for the development of this part of the test:

- In order to satisfy section 7.1.4 of the 2nd Driving License Directive referring to a “random check”, all candidates in the UK are asked two random vehicle safety check questions before moving away. These are basic safety checks that a driver should be able to carry out to make sure the vehicle is safe for use. To ensure uniformity they must be selected from the bank of 13 combinations of questions. As a rule, these combinations should be used in rotation.

- In the Netherlands and in Germany the examiner has two options at the beginning of the driving test. He/she can ask questions about the safety outside of the car (e.g., questions on tires) or inside the car (e.g., dashboard, position of the head rest and other safety items). In most cases the examiner does not ask more than three questions.

- In Finland in addition to these questions a candidate must demonstrate the ability to use at least one type of equipment.

- In Norway, a check card with two questions (out of a bank of 36 cards) is used, one of them always giving the candidate a task that leads to a practical action to be done, for example: “Find and set up the warning triangle”.

4.5.3. Feedback at the end of the test

The driving test should be viewed as a step within the learning process rather than its conclusion. Therefore, clear, objective, and structured feedback to the candidate after the test, especially if they failed, is essential and should always be provided. Successful candidates should also receive advice on safe and independent driving, as well as responsible behaviour while driving.

Although EAG members could not understand the language, it was reassuring to see that candidates received detailed feedback on their performance from the examiner at the end of the test. They understand the feedback will help candidates gain insight into their driving abilities and provides valuable information on areas needing improvement.

Additionally, the practice of candidates receiving their practical driving test report in their inbox on the Estonian Transport Administration's e-service is an excellent complementary measure.

However, there were some individual practices observed that compromised the standardisation in providing information to the candidates. In certain testing centres, a white board was used to give feedback to candidates.

Recommendations

(1) To ensure a valid, consistent, and reliable assessment, examiners must be well-trained and competent, with their expertise developed through ongoing training.

(2) Additionally, enforced quality control should ensure the consistency of examiner standards, so that all tests adhere to the same requirements and procedures.

(3) In order to give a more active role to the candidate during the feedback session, and this could be achieved with different initiatives:

- The examiners could simply ask students the reasons for a certain reaction or behaviour during the test.

- Some driving licencing authorities have promoted the use of a self-evaluation form (a learning tool based on GDE matrix ideas) that candidates must complete before the practical test and that allows candidates to gain insight into their driving abilities. Candidates feel more involved and responsible for his own assessment by contrasting his opinion with the examiner's and could be a nice addition to the practical test in Estonia.

5. THE THEORY TEST IN ESTONIA

During the visit of the CIECA expert groups to Estonia, the Estonian Driving Schools Association raised concerns regarding the introduction of new exam questions by the Transport Administration. They claim these new questions have led to a significant drop in exam pass rates, falling to six to seven times below the usual level. The association noted that a pass rate of around 10 percent is unprecedented in Estonia and Europe, describing the situation as extraordinary. They recalled that the last update of the exam questions in 2019 did not result in a significant drop in passing rates.

However, TAG members would like to clarify that when major changes are made to theory tests, many countries experience drastic drops in pass rates. For example, Finland changed its theory test on 1 July 2018, and the pass rate for first attempts dropped from 87% to 60%. Similarly, Latvia stopped publishing their items in the B-class theory test on 1 June 2024, and the pass rate for first attempts dropped from 88% to 56%. Major changes require time for candidates and their training to meet the new requirements. It is important to allow sufficient time for the new test so that proper conclusions can be drawn.

The Estonian Driving Schools Association highlighted several issues with the new national theory exam questions, including unclear wording, difficult new diagrams, and some questions being incorrectly entered into the system. This is also a normal process that may occur when new items are introduced in a test, and Transpordiamet, like all countries making changes, should continuously observe the theory test to ensure its quality and to identify and correct any errors.

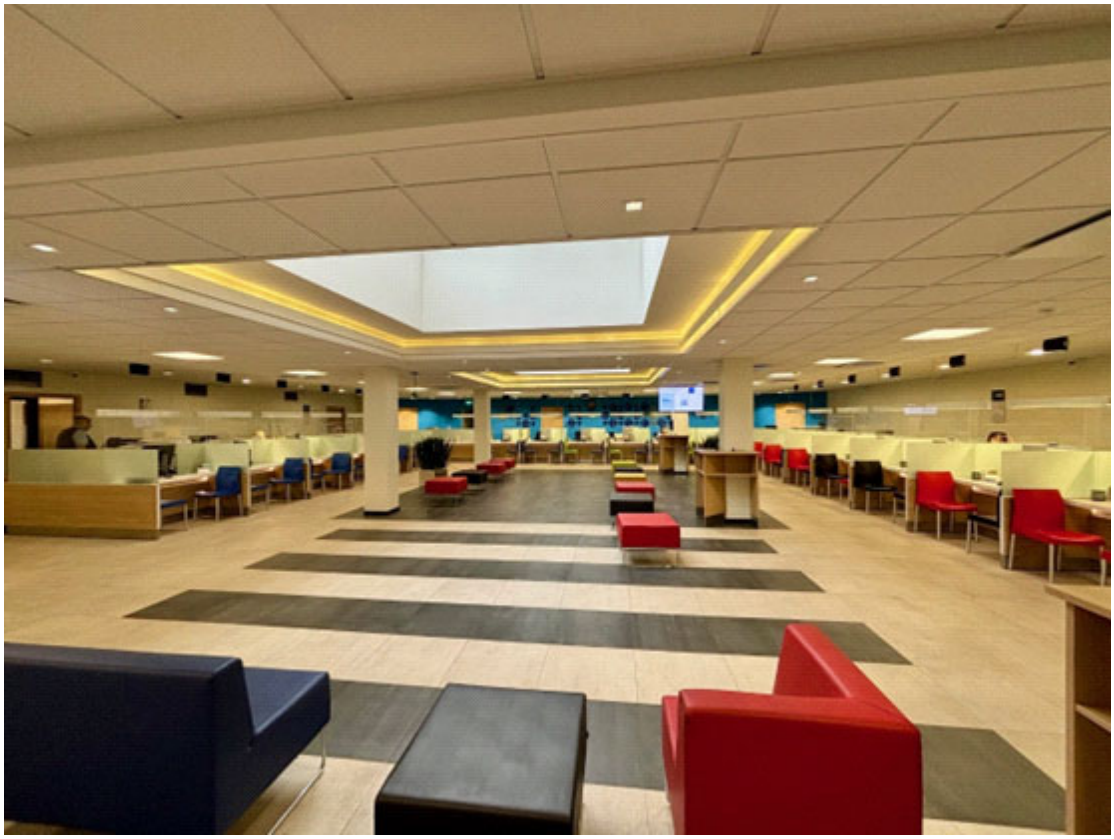
The content of the theory exam has been changed to prevent test takers from simply memorising questions. Driving in traffic requires competence and knowledge, not just memorisation of traffic situations. Increasing the number of questions in the item bank challenges candidates to have the required knowledge and ensures that the questions are in line with modern developments such as ADAS systems and new technology. A larger item bank also makes the test less predictable and allows the same situations to be tested in multiple ways. The test has clearly been improved and meets the skills required for the driving test.

In short, TAG experts believe that the Estonian authorities have updated their theory test to better meet the requirements of the EU driving licence directive. The content of the exam aligns with the goal set by the Estonian authorities to improve traffic safety. The new exam is more challenging than the old one, ensuring that proper knowledge is required from candidates to meet traffic safety goals. Additionally, the pictures in the test are more descriptive and provide improved context. TAG experts believe the new theory test in Estonia meets the required standards.

5.1. Strengths of the system

Efficient registration process

Registration for the exam was well executed, with ample service counters at the exam centre to assist customers arriving for the exam.



Premises of the Estonian Transport Administration in Tallinn.

Calm and bright test premises
The test premises were calm and bright. Despite several people taking the test simultaneously, applicants did not disturb each other. The test supervisor could move around the test space without causing any disturbance.

Identity verification
At the beginning of the theory test, applicants' identities were checked in the room where the test was conducted. Although this took some time, it prevented the possibility of identity swapping between registration and the exam.

Clear test instructions
Test instructions were provided in three different languages, and all applicants seemed to understand them well. Due to these clear instructions, exams that ended at different times concluded smoothly, and customers knew how to leave without disturbing others.

Effective practice test tablet
The practice test tablet was beneficial in passing the exam. TAG members could see both old and new exam questions. The reform has improved the quality of the exam questions, aligning with Estonia's traffic safety improvement goals. The new questions are clear and challenging enough.

Expanded item bank
The item bank has been significantly increased from the old test, allowing for a sufficient change of test questions if an applicant fails and must retake the theory test.

Compliance with EU Directive
The revised test meets the requirements of the European Union's driving licence directive and covers a wide range of topics:

- **Traffic rules**: Including traffic signs, signals, driver duties for pedestrian safety, and additional requirements for child safety.
- **Driver responsibilities**: Focuses on attention, judgement, response time, and the impact of fatigue or substances on behaviour.
- **Road and weather conditions**: Covers safe following distances, braking, staying on the road, and handling weather-related hazards.
- **Interactions with other road users**: Specific hazards related to inexperienced drivers, children, cyclists, and pedestrians.
- **General requirements and accident protocol**: Includes insurance, accident response, and safety measures for drivers, vehicles, and passengers.
- **Precautions on exiting vehicles**: Preventing risks from surrounding traffic and securing the vehicle.
- **Mechanical aspects of traffic safety**: Identifying issues with steering, braking, tyres, mirrors, and more.
- **Vehicle safety equipment**: Use of seatbelts, headrests, child safety gear, etc.
- **Environmental considerations**: Proper use of vehicle horn, fuel economy, and pollution control.

Randomised test questions
Randomising the test questions helps prevent the item bank from leaking to outsiders and makes the test less predictable, reducing the possibility of cheating.

Category B theory exam structure
The Category B theory exam consists of 40 questions, 10 of which are traffic safety questions. The total exam time is 30 minutes, and to pass, at least 36 questions must be answered correctly, with no more than one mistake in the traffic safety questions.

Improved question security
In a conversation with the Transpordiamet's staff, it was revealed that exam questions were previously publicly available. In the new exam, questions are in a hidden item bank, significantly improving the quality of the theory exam. A small question bank and public questions make it easier to memorise answers, but the theory exam should test knowledge, not memorisation. The new theory test enhances traffic safety and the level of students' skills in traffic.

Tablet-based tests
Tests performed on a tablet generally work well, and customers were comfortable taking the test. The test system also functioned efficiently.

5.2. Sensitive Points and Recommendations

Coat rack usage
Applicants were informed at the beginning of the test that there is a coat rack for bags and other items. However, they were not asked to leave their coats there. Leaving jackets on increases the possibility of cheating, as it is easier to hide equipment inside them. We recommend that applicants be asked to remove their outer clothing when taking the test.

Data protection
When the exam supervisor checked the identity of the customers, the screen displaying personal information was positioned so that people in the queue could see others' personal information. For data protection, it would be beneficial to use a privacy film for such screens or reposition them so that people waiting in line cannot see the screen.

Tablet issues
At the beginning of the theory test, several tablets had problems. Although these were resolved quickly, the start of the test was delayed for several customers.

Entrance to the room of the theory test in Tallinn.

Lack of written instructions
The test tablet had no written instructions on how to conduct the theory test; all instructions were given orally before the test. It would be helpful to consider whether written instructions would make it easier for non-native speakers of Estonian, English, or Russian to take the exam.

Hazard prediction
There were some elements of hazard prediction in the exam questions, but we strongly recommend further investment in developing this aspect of the exam.

Interpreted exams
The monitored exams did not include an exam with an interpreter. However, after speaking with Transpordiamet experts, it became clear that interpreted exams are conducted in the same room as other exams. We encourage ensuring that interpreted tests do not disturb other test takers' concentration and considering whether these tests could be conducted in a separate room.

Traffic safety questions
Special attention should be paid to traffic safety questions to ensure they are correct, unambiguous, and agreed upon by traffic safety experts, as only one mistake is allowed in this section of the exam.

External authors
When exam questions are purchased from an external author, it is crucial to ensure that the authors have clear instructions on how to create the exam questions and what they should be like. Additionally, the person ordering the questions must have a quality assurance process in place before the questions are published.

Quality assurance

The quality assurance of the exam questions should be improved and developed so that any changes are clearly processed and potential errors in the questions are caught quickly. Quality assurance should be a continuous process involving several people. Additionally, it would be beneficial to consider using statistics obtained from the test to support quality assurance. A process for correcting deficiencies identified by statistics and quality assurance should also be established.

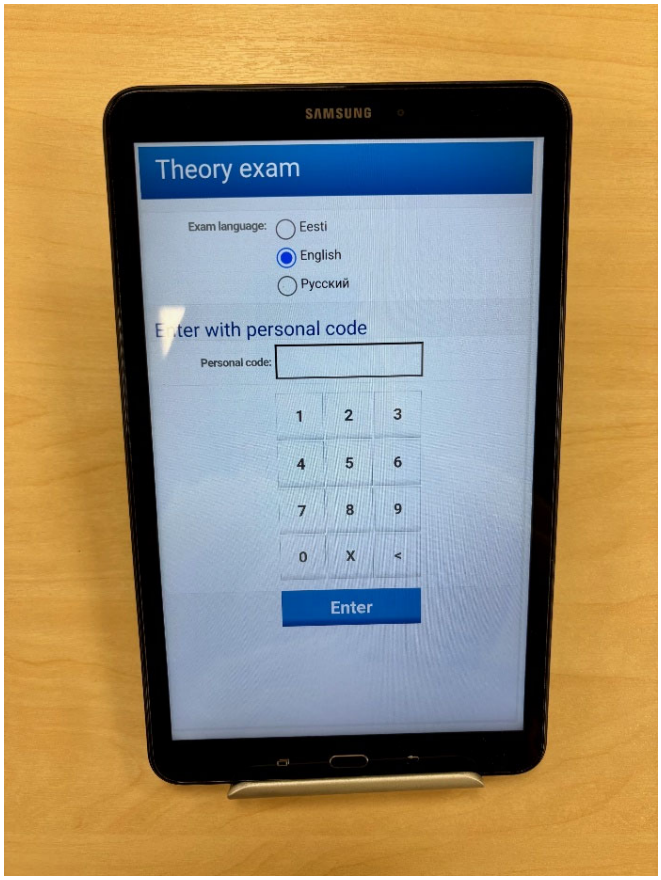


Image enlargement reminder

A brief reminder that images can be enlarged would be advisable. Some exam questions appear clear at first glance, but the correct answer can only be seen by zooming in on the image (e.g., a question about a blind pedestrian).

Tablet orientation

The test tablet is in a vertical position, which means that the images remain small, requiring customers to constantly enlarge them to understand the image. This takes extra time. We recommend designing the test horizontally so that the images are as large as possible, reducing the need for enlargement.

Button layout

The buttons at the bottom of the test tablet are in an illogical order, making it easy to press the wrong button during the test. Typically, the buttons to move right and left are at the far right and left edges, with other buttons in between. In the Estonian theory test, both buttons to move left and right were on the left side of the tablet. Additionally, the option to review answers after the exam was not very clear. This may be due to translation issues, but it would be beneficial to review the system's functionality with a service designer.

6. DRIVER EDUCATION IN ESTONIA

The ETG prepared this brief after visiting a training centre in Aseri and attending driver tests in Rakvere.

6.1. The case for theoretical education[3]

The lack of quality theoretical education can lead to several significant issues:

- Increased accident rates: Without a solid understanding of traffic rules and regulations, drivers are more likely to make mistakes that can lead to accidents. This is particularly true for young or inexperienced drivers.
- Poor decision-making: Drivers who lack proper theoretical education may struggle to make safe decisions in complex traffic situations. This can include misinterpreting traffic signs, failing to yield the right of way, or not understanding the implications of certain road conditions.
- Higher stress levels: Inadequate traffic education can increase stress levels for drivers, as they may feel less confident and more anxious on the road. This can further impair their ability to drive safely.
- Inconsistent knowledge: Without standardized, high-quality education, there can be significant variations in traffic knowledge among drivers. This inconsistency can lead to unpredictable driving behaviours, making the roads less safe for everyone.
- Increased fatalities and injuries: Ultimately, the lack of proper traffic education can contribute to higher rates of fatalities and injuries on the road, as drivers are not adequately prepared to handle various driving scenarios.
- Improving the quality of theoretical traffic education is essential for enhancing road safety and ensuring that all drivers have the knowledge they need to navigate the roads safely and confidently.

6.2. The case for practical education[4]

The lack of quality practical education in traffic understanding can lead to several critical issues:

- Inadequate skill development: Practical education is essential for developing the necessary driving skills. Without it, drivers may lack the hands-on experience needed to handle real-world driving situations safely.
- Increased accident rates: Drivers who haven't received sufficient practical training are more likely to be involved in accidents. They may not know how to react appropriately in emergencies or complex traffic scenarios.
- Poor hazard perception: Practical education helps drivers learn to identify and respond to potential hazards on the road. Without this training, drivers may fail to recognize dangerous situations in time to avoid them.

---

[3] For further information, please check the following references *(All accessible on 3 December 2024):*
https://opentransportationjournal.com/VOLUME/15/PAGE/61/FULLTEXT/
download (lu.se)
The effect of road safety education on the relationship between Driver's errors, violations and accidents: Slovenian case study | European Transport Research Review | Full Text (springeropen.com)

[4] For further information, please check the following references *(All accessible on 3 December 2024):*
ETSC-LEARN-Report-on-the-Status-of-Traffic-Safety-and-Mobility-Education-in-Europe.pdf
LEARN! Summary - Improving Traffic Safety and Mobility Education in Europe (trafficsafetyeducation.eu)

- Lack of confidence: Drivers who haven't had enough practical training may feel less confident behind the wheel. This can lead to hesitation and indecision, which can be dangerous in fast-moving traffic.
- Inconsistent driving standards: Without standardized practical education, there can be significant variations in driving skills among drivers. This inconsistency can make the roads less predictable and more hazardous for everyone.
- Improving the quality of practical traffic education is crucial for ensuring that all drivers have the skills and confidence they need to drive safely.

6.2. The current training framework in Estonia

6.2.1. Training curricula

Although the curricula for the training have not been reviewed, some general observations applicable to all education can be offered. It is crucial to have curricula that are clear for both students and teachers, containing learning outcome descriptions and goal verbs that are achievable while also promoting road safety.

It is understood that there is a curriculum with certain basic guidelines and that each driving school develops its own teaching plans and a form of curriculum. Questions arise regarding the quality assurance of these curricula. Which authority is responsible for performing such quality assurance? While educational authorities possess the competence to address potential pedagogical challenges, road authorities have the best expertise on traffic-related professional issues.

6.2.2. Visit to a driving school

A visit was made to a well-organised driving school. The practice of tracking the student's driving in all sessions, where the content, purpose, and route of the training could later be reviewed, provided, on paper, quality assurance. This system allowed students to choose a different driving instructor or enabled the assignment of a different instructor to various students. In this way, the training is not determined by the student's own narrative or perception of achieved learning objectives. Instead, the system captures this information and provides a more objective description of goal attainment, route selection, and student progress.

However, concerns about the general quality of the driver education were raised when reviewing the results of the tests globally together with the rest of experts.

6.2.3. Lifelong learning

The Estonian authorities have an established system for lifelong learning:

(1) They offer non-mandatory bicycling courses in primary school, where students can earn a cycling certificate. The cycling certificate is mandatory. Therefore, cycling training should also be mandatory. It seems somewhat contradictory to require a certificate while the authorities do not have a unified system for conducting quality-assured training. It is commendable that some schools conduct such training with the help of the authorities, but there should be an even better system in place where all schools that educate children must conduct cycling training based on a well-developed curriculum.

(2) Additionally, they have a system where 18-year-olds who pass the theoretical and practical driving tests enter a two-year probationary period before obtaining their permanent driving license. During this two-year period holders of a provisional license must undergo further training, including a course on a slippery track and instruction in eco-driving. Thus, the principle of lifelong learning is well maintained but could still be further elaborated.

6.2.4. Mandatory classes

Obligatory driving school training can be beneficial as it is a way of making sure that candidates have done some preparations before they take the test, but high-level professionals are needed to carry out the training to ensure a sufficient standard.

Although there seems to be a quality control system for driving schools in place, according to the observations of the ETG during the tests, it is not completely effective. In short, it is crucial to give priority to the quality control of driving schools and driving instructors in Estonia, especially because training is mandatory. Without a strong education framework, and a properly supervised education system, there is always a danger that mandatory training becomes more a source of income to the driving school industry than a real contribution to better safety on the road.

Recommendations

(1) Mandatory lessons should not only cover basic knowledge. It would be better to introduce subjects such as how to contribute to interaction and reduction of risk in traffic, and it would make more sense to train candidates in spotting potential risks and how to meet them. The content should be picked in the light of road traffic safety goals and in relation to the test.

(2) The applicant should be able to drive in different driving situations at different speeds within and outside of urban areas, especially in rural roads.

6.2.5. The link between the theory education and the theory test

During the visit of the CIECA expert groups to Estonia, a discussion arose regarding whether the theoretical driving test has become exceedingly difficult to understand or if the test itself is of low quality. The low pass rate does not necessarily indicate poor quality of the test but may instead reflect a shift in the competences being assessed. Such a change should aim to strengthen the theoretical foundation of students, thereby enhancing the basis for road safety. A low pass rate could also be attributed to inadequate instruction, which would be traced back to the driving schools, as candidates may be encouraged to study by heart all the questions susceptible to appear in the test which is by no means the best way to interiorize and understand information.

Students receive 20 hours of instruction before taking the theoretical driving test. This should provide a solid foundation for understanding the theoretical aspects assessed in the test. Insufficient grounds exist to comment on the quality of this instruction, but this is something that CIECA or the Estonian authorities should prioritise moving forward. An underlying issue exists where Estonian driving schools fall under the Ministry of Education and not the road authorities. Questions arise regarding whether the Ministry of Education possesses the necessary expertise to assess the quality of driving schools. It is suggested that the Estonian authorities consider changing this. The driving school industry operates within a market economy, necessitating the assurance of the quality of the instruction provided. The Estonian Road authorities would be the appropriate body for this task.

Recommendations

(1) The ETG urges Estonian Transport Administration to review the quality assurance system in place, so it effectively guarantees the quality of the training provided by driving schools and accompanying persons as soon as possible. The quality of the driver education will always depend on the instructor's competence and how he can apply the right methods to facilitate a good learning environment. At the moment, there are no EU-requirements for the content of the training for driving instructors (or examiners) but developing a proper set of minimum standards for driving instructors, together with a quality control system is the best way to ensure a high standard in the quality of the training provided.

(2) The ETG would like to recommend Estonian Transport Administration to check the results of the Road User Education Project (see section 6.3. in page 42) which includes the development of minimum driver competence standards, and a framework for a driver education curriculum. The tools that resulted from this project could be of great help to Estonian Transport Administration to develop minimum driver competence standards, and framework for a driver education curriculum.

(3) The ETG would like to suggest that Estonian Transport Administration gets in touch with the CIECA Educational Topic Group and requests its help to better assess the conditions of the current training of driver instructors in the country. Several members of the ETG were involved in the RUE project, and they would be able to explain how to use the tools contained in the RUE project to Estonian authorities and driving schools.

6.2.6. The link between the practical driver education and the practical test

A good practical driving test should guide the training and candidates' preparations, especially if the content and requirements of the test are comprehensively known to the parties beforehand. Issues that are not tested will often be neglected during training. For example, if situations like giving priority to pedestrians, maintaining a safe distance from the vehicle in front, or speed adaptation on the open road are not tested, such aspects may not be taken seriously during training. Clear communication about the test content is recommended.

The practical training is relatively extensive, consisting of 30 lessons. In addition to this training, students have the opportunity to practice driving privately if they choose to drive accompanied by a personal supervisor. One would assume that with such comprehensive training, candidates would possess a broad and solid competence when presented for a practical driving test.

However, of the 27 practical tests observed during the visit of the CIECA experts, only 7 resulted in a pass. This could indicate several issues: either the threshold for passing the practical test is very high, the quality of the practical training is poor, or candidates are being presented for the practical test too early. This requires further investigation by the authorities.

It seems that the underlying problem remains that the road authorities do not have control over the driving schools. Questions arise regarding the extent to which driving schools in Estonia are evaluated and whether there is a supervisory mechanism to assess the pedagogical soundness of the instruction. If such a mechanism does not exist, it should be established to achieve the quality goals set at all levels.

Recommendations

(1) Clearly communicate what the test entails to ensure all relevant aspects are covered during training.

(2) Encourage instructors to be present in the test. Allowing the teachers to be present in the test, and in the feedback session at the end of the exam, could have a positive impact at different levels:

- This would allow the driving schools to gain more insight into the actual test requirements and enable them to prepare their candidates better. This would also be good for the development of their own business.
- It would also strengthen the relationship between the candidate and the driving instructor as he becomes more involved in the process and can develop an insight into how candidates perform under test conditions.
- In addition to the driving examiner's feedback, the candidate could also receive feedback from the driving instructor.
- The presence of the driving instructor could also encourage the driving examiner to assess more objectively.

(3) Authorities should investigate the reasons behind the low pass rates to determine if the issue lies with the test difficulty, training quality, or premature presentation of candidates.

(4) As mentioned in previous sections, a supervisory mechanism to assess the quality of instruction provided by driving schools should be established. Transferring control of driving schools to the road authorities to ensure consistent quality and adherence to pedagogical standards should be considered.

(5) The development of a form to be completed by the driving school that contains the record of completion of tasks that shows that learners have acquired the necessary competences while following classes in a driving school, and that is available for the examiner at the time of the test. Alternatively, a certificate from a driving school could also be accepted. If a driver instructor consistently presents candidates who according to the form have fulfilled all tasks, but that are unable to show basic skills at the test, driver examiners should inform about this situation to the appropriate officials. It may also be possible to request a similar document for all candidates that take a mock test with a driver instructor working in a driving school in preparation for the test.

6.3. The RUE Project

The RUE-project report is the result of an internal CIECA-project that took place from 2013 to 2014. Important EU legislation relating to driving licences (EU Driving Licence Directive 2006/126/EC, laying down the requirements for a European driving licence) is already in place.

Despite the fact that to “improve education and training for road users” is the primary objective formulated in the policy orientation "Towards a European road safety area: policy orientations on road safety 2011-2020” by the European Commission (2010), the current Directive does not make any reference to the skills, behaviour and knowledge that should be passed on to the learner driver, how these should be passed on and which minimum requirements apply for persons delivering the professional driver instruction and accompanied driving. The absence of a common European Directive in these areas has resulted in a fragmented system with a range of national strategies and approaches, and it seems that this situation is not going to be remedied with the revision of the Directive that is currently taking place.

All CIECA expert groups encourage Estonian Transport Administration to refer and consult The Road User Education project which was aimed at developing recommendations regarding:

- Minimum driver competence standards,
- A framework for a driver education curriculum, and
- Minimum standards for driving instructors and accompanying persons.

The work was carried out by a comprehensive group of outstanding CIECA members, bringing along both excellence in the field and insight into specific conditions and institutional settings. Some of the project members are part of the CIECA Education Topical Group which supports helps CIECA members with the review and development of driver education in CIECA countries.

6.4. Traffic safety campaigns

The ETG support the implementation of traffic safety campaigns. Such campaigns can have a beneficial impact both in the short and long term. For campaigns to be most effective, it is essential that they are also evaluated. This evaluation should be conducted by experts, who in some cases, may be external to the campaign creators themselves. An objective perspective is crucial for

executing future targeted campaigns, and good evaluations should include information on how many people the campaigns reach, the quality, and the impact of the campaign. .

Examples indicate that evaluations conducted through surveys and similar methods directed at the campaign's recipients can yield the desired effect. If the evaluation is conducted solely by the campaign creators, there is a risk of bias towards their own work, lacking an external perspective on content and quality. Measuring the impact of campaigns is always challenging, but it is possible to assess whether the message is understood and whether individuals perceive that the campaign changes attitudes and behaviours.

6.5. Education of driver teachers

Questions were raised regarding the education of driving instructors. Consideration of alternative forms of education to the existing ones is suggested. It is understood that most driving instructors receive their education through courses which, while being very extensive, only require attendance 1-2 times per month over 8-10 months. This raises the question of whether this provides a sufficient foundation for delivering high-quality training and whether driving instructors can address all aspects of the training, especially those related to the development of high-level competences of candidates. The GDE matrix (Pääraho et al.) describes the necessary competencies as follows:

- **Knowledge and Skills**: Fundamental skills and knowledge required by a driver for typical traffic situations.
- **Risk-Increasing Factors**: Elements that can elevate the risk during driving, such as the driver's physiological condition.
- **Goals and Context of Driving:** The purpose of the journey, route planning, and assessment of the necessary driving time.
- **Safety and Control**: Ensuring passenger safety and maintaining control over the vehicle.

Regardless of whether the principles of the GDE matrix are followed, each of these elements individually and collectively constitutes essential competencies for drivers, enabling them to contribute to reducing accident susceptibility.

Concerns exist that poor-quality driving instructors may only teach students to pass the practical driving test. Competence at various levels is crucial for today's road users, and this principle is increasingly important in European traffic safety efforts.

THANK YOU TO ESTONIAN TRANSPORT ADMINISTRATION

The EAG, TAG and ETG would like to thank the Estonian Transport Administration for their warm hospitality, excellent organisation, and interesting discussions during this visit.

If Estonian Transport Administration needs further services of the CIECA expert groups or has any questions on this report (or on any other issues) the CIECA Secretariat will be happy to help with any request.