

Review of the Western Australian Graduated Licensing System - Car Licence

**RAC response to the Department of
Transport and Major Infrastructure**

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RAC response to the *Graduated Licensing System Review for Car Drivers*

We thank the Department of Transport and Major Infrastructure (DTMI) for the opportunity to provide feedback to inform the development of recommendations for changes to the WA Graduated Licensing System (GLS) for car drivers.

Summary of recommendations

1. As a top priority, RAC supports extending the minimum learner period from 6 months to 12 months, which should apply to learners of all ages.
2. As a top priority, RAC believes that the minimum supervised driving hours should be increased, but this should be further than is proposed – ideally to between 100-120 hours but at a minimum to 80 hours.
3. RAC supports extending the provisional period from 2 years to 3 years.
4. As part of reviewing the minimum learner period and the length of the provisional period, RAC believes that the novice driver categories under the demerit point system should also be reviewed.
5. RAC supports the introduction of an online theory test and hazard perception test, and DTMI should seek to pilot and evaluate training modules to be completed as part of the testing.
6. RAC broadly supports the introduction of a hands-free mobile phone restriction for learner and provisional drivers, but this should be evaluated.
7. RAC supports the planned review of WA's motor vehicle driver instructor laws, which should look at enhanced training requirements for instructors.

About RAC

RAC is a purpose-led member organisation. Since our foundation in 1905, RAC has existed to be a driving force for a Better WA – this is our purpose. We act as a voice for more than 1.3 million members in more than 60 per cent of Western Australian households. We work collaboratively with government, industry, our members and all Western Australians to champion change that will deliver safer, sustainable, and connected communities – this is our 2030 vision:

- **Safe** – We want fewer people killed or seriously injured on our roads;
- **Sustainable** – We want to reduce harmful vehicle emissions for cleaner, healthier air; and
- **Connected** – We want well-planned communities and transport that better connect people and places.

Introduction

RAC supports a GLS to enable people to gain practical driving and riding experience in lower risk situations.

In September 2024 RAC participated in the State Government’s Road Safety Roundtable held to address an increase in WA’s road deaths and the rate of young people being killed and injured on WA roads. One of the key issues raised by RAC was the need for the GLS for both car drivers and motorcyclists to be strengthened. In relation to car drivers, we called for three key changes:

- Increasing the minimum learner period;
- Increasing supervised hours in the learner phase; and
- Introducing peer passenger restrictions while drivers are on their red P plates.

RAC welcomed the introduction of peer passenger restrictions in December 2024 alongside a commitment to commission a comprehensive review into the existing learner and provisional driver licensing schemes, as well as skills and training requirements for motorcycle and heavy vehicle licences. RAC was represented on the Graduated Licensing Review Reference Group, through which we helped to identify potential changes to the GLS and provided input into the development of discussion papers regarding improvements to the current licensing systems.

Minimum learner period

RAC supports the proposal to extend the minimum learner period from 6 months to 12 months before a person can sit their Practical Driving Assessment.

There is strong evidence that a longer minimum learner period will improve safety and this has already been implemented in all other Australian jurisdictions except Northern Territory, in line with the standard model in the national policy framework (Walker, et al., 2015). It is also a good way of encouraging people to gain more supervised hours, including drivers aged 25 years and older who are not subject to minimum supervised driving hours.

An Austroads literature review of effective GLS components (Austroads, 2015) identified a minimum learner period of 12 months as one of the most well evaluated components, and therefore having the most examples of quantified benefits in terms of crash and/or injury reductions. It noted that evaluations consistently show early provisional crash-reduction benefits of minimum learner periods of 6 months over none, and 12 months over 6 months.

Transport for New South Wales’ Australian graduated licensing scheme policy framework (Transport for New South Wales, 2014) notes that research shows sufficient time is needed to maximise both depth and breadth of experience as a learner before progressing to a provisional

licence. This is to enable the learner to develop the ability to perceive, anticipate and identify potential hazards and to respond accordingly. A 12 month minimum learner period will enable time for greater experience and across all seasons. Evaluations of increases in the minimum learner period from 6 to 12 months in Queensland and Victoria indicated positive road safety outcomes.

A recent report on novice driver licensing from the Centre for Automotive Safety Research (Centre for Automotive Safety Research, 2024) states that evaluations have consistently shown crash reductions during the restricted phase with minimum learner periods of 12 months instead of 6 months, provided time is used to increase supervised driving.

Length of provisional period

RAC supports the proposal to increase the provisional period from: 2 years (6 months P1 and 18 months P2); to 3 years (1 year P1 and 2 years P2).

While the optimal length of time for a provisional licence is unknown, extending the provisional period to 3 years aligns with the enhanced model of the national policy framework as well as most other Australian jurisdictions. It also means that the minimum age for unrestricted driving would be 20 years of age. This ensures that GLS restrictions such as a blood alcohol content of 0.00% are in place for all 17-19 year olds, who have a significantly highest rate of deaths and serious injuries than any other age group, at approximately double the overall rate (Road Safety Commission, 2025).

The Austroads literature review (Austroads, 2015) notes that alcohol-related research demonstrates increased crash and fatality risk even at low alcohol levels until age 21 in particular.

Transport for New South Wales' Australian graduated licensing scheme policy framework (Transport for New South Wales, 2014) identifies several benefits of a longer provisional period, including a zero BAC requirement and lower demerit point threshold, and recommends jurisdictions consider having a total provisional period of 3 years and ultimately aim to have a 4 year provisional period.

Logbook hours

RAC supports the proposal to increase the minimum supervised driving hours (logbook hours) from 50 hours (including 5 hours nighttime driving). However, we do not believe that the proposed 75 hours (including 5 hours nighttime driving) is sufficient. RAC supports an increase in mandatory supervised hours to bring WA in line with other states (ideally between 100 and 120 hours); and 80 hours at a minimum.

Increasing supervised hours in the learner phase reduces crash risk when a full licence is gained. The Austroads literature review (Austroads, 2015) notes that, in terms of improved skills and crash risk, the optimal threshold is likely to be between 80-100 hours (or 5,000 km) and 120-140

hours (or 7,000 km). It also points to evidence that the higher the number of hours, the more experience in complex driving conditions and the higher the pass rates on practical driving tests. Transport for New South Wales' Australian graduated licensing scheme policy framework (Transport for New South Wales, 2014) notes research, predominantly from European and Australian evaluations, which suggests that setting a requirement for between 80 and 120 hours will have crash reduction benefits. It also highlights that significant crash reductions were recorded in Victoria after they introduced a GLS which included a requirement for 120 hours and in Queensland after they introduced a GLS with a requirement for 100 hours. Furthermore, it points to Victorian research that found that the nature of supervised driving changes during the latter phase of the learning period (after 80 or 90 hours). During this time, driving involving more challenging and complex situations is undertaken, which may indicate that supervisors and learners need a significant amount of time to feel comfortable before undertaking complex driving.

The national policy framework requires 50 logbook hours under the standard model, 80-100 hours (including 10 hours at night) under the enhanced model and 100-120 hours (including 15-20 hours at night) under the exemplar model (Walker, et al., 2015). New South Wales and Victoria have already implemented the exemplar model, while Queensland, Tasmania and the Australian Capital Territory have implemented the enhanced model.

The discussion paper states that it is not considered practical to implement an increase in the minimum supervised driving hours beyond 75 (including 5 hours nighttime driving). This appears to contradict developments in other Australian states with significant regional and remote populations, including New South Wales and Queensland, which have managed to increase hours as high as 100-120. RAC acknowledges that disadvantaged groups can struggle to meet the requirements of the GLS, for example accessing cars and supervisors. However, this should be addressed through specific initiatives aimed at these groups rather than applying a lower safety standard to the whole population. Building on the work of DTMI's Driving Access and Equity Program, the WA GLS could allow disadvantaged learner drivers to trade-off logbook hours if they participate in driver training courses or undertake structured driving lessons with a licensed driving instructor (as already permitted in New South Wales, Queensland and the Australian Capital Territory).

If WA were to increase the minimum supervised driving to 75 hours, with 5 hours of nighttime driving, then logbook requirements would remain below the enhanced model and the lowest of any Australian jurisdiction except Northern Territory. Based on the research evidence, a minimum of 80 hours (in line with the enhanced model) would have additional road safety benefits. However, a minimum of 100 logbook hours (in line with the exemplar model) would likely be optimal in building learner confidence, and providing enough opportunities, to be exposed to more complex driving situations prior to solo driving.

Theory Tests and Hazard Perception Tests

RAC supports the proposal to introduce an online option for both the theory test and the hazard perception test in addition to retaining in-centre test provision, provided measures are in place to identify and address any potential cheating.

An online option will improve access to testing for learners, particularly those living in regional and remote WA. In addition, it creates an opportunity to provide online theory and hazard perception training as part of an online course that culminates in a test. Where new training modules are developed, their impact should be evaluated. Victoria, New South Wales, South Australia and Queensland's theory tests require completion of a minimum 4-hour interactive online course about the road rules and safe driving behaviour. First aid training could also be piloted.

Hazard perception training is not currently mandated anywhere in Australia but typically involves either observing expert drivers explaining how to identify hazards or performing a driving task in a simulator and receiving feedback. Several studies examining the benefits of hazard perception training via simulators have found improvements in drivers' abilities in identifying hazards, faster response times to hazards, increased following distances, and greater time spent looking in areas where hazards may appear (Centre for Automotive Safety Research, 2024).

Mobile phone restriction

RAC broadly supports the proposal to introduce a hands-free mobile phone restriction for learner and provisional drivers, which would encourage inexperienced drivers to focus their whole attention on the driving task. However, the introduction of this restriction should be evaluated given limited previous research on its effectiveness specifically as part of the GLS.

A restriction on hands-free phone calls should be applied regardless of whether or not the call is made through an in-car system. As proposed in the consultation paper, drivers should still be permitted to use their phone for audio or navigation purposes if this is set up prior to commencing the journey.

Western Australian research has shown that drivers are about four times more likely to end up in hospital following a crash where they were using their phone. Even legal acts such as using hands-free (e.g. Bluetooth) devices have been shown to increase the risk of having a serious crash (McEvoy, 2005). Inexperienced and younger drivers appear to make more errors than older drivers when managing divided attention when driving (Transport for New South Wales, 2014).

More recent research using driving simulators shows that young drivers exhibit considerable deficits in attention and driving performance when using a phone, including failing to stay in the traffic lane and driving faster around curves (Centre for Automotive Safety Research, 2024).

While there is strong evidence that mobile phone use by inexperienced drivers increases crash risk, there is limited evidence on the effectiveness of GLS mobile phone restrictions (despite hands-free phone use already having been banned throughout the provisional period in New South Wales, Victoria, the Australian Capital Territory and the Northern Territory). There is an opportunity to evaluate the introduction of a hands-free mobile phone restriction for provisional

drivers to strengthen the evidence base for this initiative. Ideally this should be undertaken before a restriction is made permanent.

Other comments

RAC supports the planned review of WA's motor vehicle driver instructor laws. We believe that driving school instructors should be required to undertake mandatory training to a minimum Certificate IV standard and should receive regular professional development training to ensure they are abreast of new rules, new vehicle technologies and effective pedagogical practices.

As part of reviewing the minimum learner period and the length of the provisional period, the novice driver categories under the demerit point system should be reviewed and simplified to align with the new periods. Under the current system, a novice driver type 1 is someone who has held a driver's licence for up to one year or periods adding up to one year, and includes first-time learner's permit holders. A novice driver type 2 is someone who has held a driver's licence for more than one year but less than 2 years. This means that the novice driver type 1 currently includes learner's permit holders, red P plate holders and some green P plate holders, which is a potential source of confusion. In addition, people who spend longer learning to drive are subject to the novice driver type 1 limit for a longer period of time. If the provisional phase is extended to 3 years then under the current system drivers on the second year of their green P plate would no longer be considered novice drivers. The approach taken in Victoria is to apply a lower 12-month demerit point limit to all learner and provisional drivers in addition to the standard 3-year demerit point limit. Since both the 12-month and 3-year periods are rolling, this removes the need to define novice driver categories or compare offence date against the date a licence was issued.

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