

Submission Document to the Joint Oireachtas Committee on Transport and Communication, Wednesday 1 February 2023.

The National Car Testing Service (NCTS)

The Road Safety Authority has overall responsibility for the operation, oversight, development, quality assurance and delivery of the National Car Testing Service (NCTS). The NCT was introduced in 2000 and, over the past 23 years, it has played an important role in improving road safety in Ireland. It has also played a vital role in protecting the environment as the NCT also enforces regulations around vehicle emissions.

Following a procurement process run in accordance with EU procurement rules, the contract for the provision of the service for the period June 2020 to June 2030 was awarded to Applus Inspection Services Ireland Ltd.

The service is provided at 49 test centres nationwide and there are plans to open new centres in an additional 5 locations, to cater for increased demand. These centres are planned in Co Clare; Dublin North; Co Cavan; Co Cork and, Co Kerry. Separately, 7 centres were refurbished last year (Drogheda, Dundalk, Kells, Carlow, Cahir, Sligo and Letterkenny). An additional test lane was installed in Deansgrange. This brings the total number of test lanes nationwide to 110.

The responsibility for the operation and delivery of the NCT service lies solely with the Contractor, Applus, and Applus's Country Manager, Mark Synott, will provide a comprehensive update on the service to the Committee.

The RSA's statutory obligations in respect of the NCT are to exercise a supervisory and oversight role to ensure the service is provided in line with the service's Project Agreement. The Project Agreement specifies the performance standards for the contractor and covers such matters as premises, test equipment, staff, test arrangements, facilities management, information technology, and customer service.

The RSA also works with its parent department, the Department of Transport, in assisting them in relation to the development of policy around vehicle roadworthiness and vehicle standards, which is a key factor in road safety in Ireland.

To assist the Authority in carrying out our supervisory role, we appointed a Supervision Services Contractor (SSC), Deloitte, to carry out certain supervisory services on its behalf. This involves monitoring the contractor's achievement of performance and service levels and reporting on these regularly to the RSA.

The performance tracking that we monitor includes:

- Average waiting times nationally and at individual test centres
- If a customer waits more than 28 days for a test, that they are offered a free test, within certain parameters.
- That 90% of customers receive a notification 4-6 weeks in advance of their test due date and 100% at least 5 days in advance of test due date.

- That the test operations ensure that testing is conducted in a consistent manner and that procedures protect test integrity.
- An analysis of test results to identify trends and/or anomalies relating to the test results achieved within individual test centres, test lanes, or by individual vehicle inspectors.
- At least 90% of telephone calls to the call centre are answered within fifteen (15) seconds.
- That customer satisfaction and mystery shopping surveys are undertaken and that findings meet the standards required.
- That operational audits are undertaken, including covering a wide range of factors including premises quality and maintenance, test equipment calibration and maintenance, IT systems, staff qualifications and training, customer service, call centre performance and complaints handling processes.

Another structural approach to performance monitoring and oversight that the RSA has put in place is the appointment of AA Ireland as Technical Inspections Services Provider. They regularly monitor the delivery of the service at the 49 test centres nationwide and at the contractor's headquarters. This includes observing tests and conducting independent tests. In 2022, the AA carried out more than 4,600 observed tests and more than 2,600 independent tests. The results show that more than 99% of testing is carried out correctly.

The RSA and the SSC have regular meetings with Applus including.

- twice weekly update meetings
- Monthly supervision meetings
- six monthly contract review meetings attended by the senior directors of both Applus and the RSA.

The RSA has met the contractor on a weekly basis, over the past year, to facilitate introduction and monitor progress on changes to work practices to increase capacity following the disruption of Covid and other challenges faced by the service since mid-2022.

A number of measures to improve capacity have been discussed and approved including:

- Extending the operational work hours
- Temporarily amending the vehicle inspector qualifications to QQI Level 5
- Introduction of paid overtime
- Facilitating the recruitment of vehicle inspectors from outside the EU (Philippines)
- Temporary secondment of vehicle inspectors from a sister company in Spain
- Introduction of a night shift in the Northpoint centre in Dublin (from the end of January)

It is acknowledged that Applus are not currently meeting the waiting time service level due to the demand and capacity issues, which their Country Manager, Mr. Synnott will expand upon. But it is important to reflect that there are a number of key service levels which are being met in full and exceeded in some cases including, issue of notifications telephone response times and test accuracy.

Turning to the issue of the backlog itself, it is no exaggeration that the service has faced some serious challenges due to the impact of COVID, which caused significant staff absenteeism levels at test centres and in the call centre. There were also very high levels of

customer no-shows and late cancellations. Reduced availability of new cars, has meant there are more older cars in the Irish fleet. This means there are circa 1.5m cars to be tested at NCT this year.

There have also been additional challenges, distinct from COVID-19 and relating to broader employment trends which have had an impact in mid-to late 2022 - difficulties in retaining and recruiting Vehicle Inspectors has also exacerbated the problem.

Taken together, these issues have caused a backlog to build as Applus did not manage to carry out as many tests as planned in 2022. This backlog has carried forward into 2023 but is planned to reduce from Q2 onwards when the Q1 seasonal peak demand has passed. The average lead time for an appointment for a test is currently 25 days. Before the pandemic the waiting time would have been less than 12 days.

Applus will outline in their submission the extensive plan and measures that they have undertaken to increase capacity within the service. These include an extensive recruitment programme in Ireland and abroad, increased overtime and opening hours. This plan will deliver improvements to the service in the coming months and a return to normal service levels by June of this year.

Vehicles Due for Testing

Vehicles Due			
Quarter	2021	2022	2023
Q1	468,464	571,790	525,079
Q2	294,268	275,308	307,221
Q3	353,611	352,802	362,896
Q4	288,878	273,038	254,150

Appeals process

Where a customer has been refused a test certificate, they have the right to appeal the decision through the independent appeals procedure. The first level for pursuing a complaint is through the NCTS internal appeals process. The relevant complaints form is available at the local NCT Centre or the NCT Complaints section can be contacted on (01) 413 5994. There is an independent appeals process available to anyone who considers that the test has not been carried out correctly. Where a customer believes they have been unfairly denied an NCT certificate, they have the right to appeal the decision. The first level for pursuing a grievance is through the NCTS internal appeals process.

If a customer is dissatisfied with the outcome of that process, they may pursue the matter through the Independent Appeals Board operated by the Automobile Association (AA) on behalf of the RSA. To pursue an independent appeal; forms may be obtained at the local test centre or by contacting the independent appeals board directly. The AA is completely independent in the provision of this service. Their contact details are (01) 617 9000 or email technical@theaa.ie.

Legal and Insurance

In relation to insurance, Insurance Ireland has confirmed that its members will be pragmatic and understanding in their approach to the current delays at the National Car Testing Service (NCTS). Cover will continue to be provided where customers, through no fault of their own, are unable to obtain their NCT due to backlogs at test centres. Under the current circumstances, provided motorists make every effort to book appointments in the normal way, insurance companies will recognise that the current issue is not the fault of the customer.

Enforcement of Road Traffic Regulations is the responsibility of An Garda Síochána (AGS). We have briefed the National Roads Policing Unit in An Garda Síochána about the current issues in the NCTS and customers should carry proof of their test booking confirmation to produce to a member of An Garda Síochána if required.

Notwithstanding this, Motor Insurance and Road Traffic Legislation requires that motorists maintain their vehicles in a roadworthy condition at all times and not just at the time of their NCT. It is each vehicle owner’s legal responsibility to ensure his or her vehicle is in compliance with the law and maintained in a roadworthy condition at all times.

Driving Test Service

Turning to the Driving Test Service at the end December 2022,

- 15,813 had been scheduled to sit a driving test in the following four weeks
- 47,364 learner drivers were waiting to receive an invitation to book their test

Separately, 49,105 customers were issued with an invitation to book a test date by the RSA but did not use that invitation within the 10 days provided.

Lastly, while a further 24,003 learner drivers have applied for a driving test date, they are not eligible to sit a test, usually because they have not completed their 12 mandatory lessons or the six-month rule applies – whereby they cannot sit a test in the first six months of having received their first learner permit.

Therefore, to be clear the actual number of learner drivers who are available, eligible and waiting for an appointment to sit a driving test is 47,364.

Table Driver Testing Application Volume by County @ end December 2022

County	Scheduled	Waiting	Paused	Not Eligible	Total
Carlow	316	1073	955	532	2876
Cavan	293	685	686	429	2093
Clare	300	1181	920	486	2887

Cork	1759	3772	5200	2565	13296
Donegal	580	1010	1137	545	3272
Dublin	4027	16905	16529	7552	45013
Galway	813	2491	2245	1137	6686
Kerry	384	1121	1369	684	3558
Kildare	756	2186	2305	1043	6290
Kilkenny	188	682	816	339	2025
Laois	222	576	717	403	1918
Leitrim	101	337	378	212	1028
Limerick	698	2727	1835	908	6168
Longford	110	335	421	206	1072
Louth	889	2562	1744	729	5924
Mayo	387	807	975	500	2669
Meath	674	939	1338	761	3712
Monaghan	131	308	290	164	893
Offaly	376	1114	1112	556	3158
Roscommon	226	406	410	205	1247
Sligo	311	419	596	272	1598
Tipperary	561	1279	1514	989	4343
Waterford	500	1386	1736	956	4578
Westmeath	552	1082	1414	624	3672
Wexford	527	1457	1649	889	4522
Wicklow	132	524	814	317	1787

At the moment, the national average time to invite for a test is 19 weeks. The service level agreement that is in place with the Department of Transport is to maintain an average waiting time of 10 weeks. Where a learner driver fails their test and reapplies, we endeavour to invite them to book another test date 6-8 weeks after their failed test. Those waiting for a truck / bus or motorcycle test are generally invited 10-12 weeks after applying.

To put this in context, the RSA is currently providing an average of 4,000 tests per week, up from 3,000 in October 2022 when we last briefed the Joint Oireachtas Committee.

The backlog of applications which built up throughout the pandemic were effectively cleared earlier in 2022 and new demand was being met within expectations up until July / August 2022.

Since then, unfortunately, there have been challenges to meeting increased demand. These challenges included,

- a 36% increase in applications for a driving test in 2022;

- there has also been a significant increase in the number of learner permits issued across all age groups but particularly those aged 17-20 and 30-39 since mid-2021.
- reduced workforce owing to staff retirements and contracted staff reaching the end dates on their contracts;
- a need for dedicated training of staff to conduct tests in higher categories so as to meet the demand for truck, bus and motorcycle tests;

To meet increased demand known at the start of 2022, we were given sanction by the Department of Transport to increase the number of permanent driver testers from 100 to 130 in early 2022. The vast majority of these permanent testers commenced in December and the remaining three commenced in January this year.

As of end January, the Driver Testing Service currently has 125 permanent testers, taking into account statutory leave, and 10 contracted driver testers available to conduct driving tests.

However, as outlined to the Committee back in October, this resource level is not enough. The current staffing level will **neither** reduce the backlog of driving tests, **nor** will it meet the projected future demands for the service (based on the learner permit demand).

In December, the RSA submitted a request to the Department of Transport seeking sanction for 40 additional temporary resources, as a full complement of circa 165 testers is required to bring us to a point where we work through the backlog and meet the 10 week average wait time.

However, beyond 2023 / 2024 the RSA projects that a permanent pool of 170 testers is required, year-in-year-out, to meet estimated future demand in the service.

We are committed to restoring the service to the 10 weeks waiting time. If a positive decision on sanction is received for the 40 additional temporary testers in the coming days, we will be able to complete the recruitment process by July, offer contracts thereafter, complete training and have those individuals testing by October. With these interventions the service would return to the levels expected. From this point onwards, we will see improvements in waiting times immediately in October, with those lists where waiting times are longest targeted first.

Requests for Urgent Tests

In relation to requests for urgent driving tests: if a customer is a Critical Frontline Worker employed by the HSE, a private hospital or the emergency services and need to drive in the course of their duties they may submit a request using the form on the RSA website. If that request is approved, then the customer will be prioritised.

In the interest of fairness and transparency to all customers, invitations to book a test slot are issued in strict rotation, with those who applied and are eligible being invited first. Where

a customer has previously failed their car test and reapplied, these are fast-tracked and sent a new booking invitation 6 to 8 weeks after their previous test, this is longer in some centres with particularly high demand.

As CEO of the RSA, I wish to acknowledge the frustration and confusion that customers have experienced as a result of the delays in securing a test appointment for the Driving Test Service and the National Car Test Service. I want to apologise to customers for this. The message I wish to tell our customers is that we are doing everything we can to return the services to normal and I want to thank you and to ask for your continued patience as we work to reduce waiting times.

Road Safety Update

Road Collision Statistics 2022

Despite our long-term progress in reducing fatalities on Irish roads, we were deeply saddened to see a 14% increase in road traffic fatalities in 2022.

There were 156 fatalities on our roads in 2022, which is 19 more deaths than for the same period the previous year. During 2022, 1,294 serious injuries were recorded.

Garda investigations are on-going to identify the contributory factors to the fatal and serious collisions, but what we do know is that:

- There has been an increase in deaths at weekends and late at night compared to 2021 – which is probably linked to the reopening of the night-time economy – a pre-COVID pattern.
- There has been an increase in the number of pedestrian (+21) fatalities in 2022 compared to 2021.

2023 Road Traffic Collision Statistics

As of 25 January, there have been 18 fatalities on our roads, which is 4 more deaths than for the same period last year. 11 drivers (+2), 1 motorcyclist (-1), 4 pedestrians (+1), and 2 passengers (+2) have died on our roads in 2023.

Causal factors in collisions

We know from international research that speeding, driving while impaired due to alcohol or drugs, driving while fatigued, distracted and not wearing a seat belt are key contributory factors to road traffic fatalities across Europe. The World Health Organisation, for example, has estimated that a 5% reduction in average speed could result in a 30% reduction in fatal collisions.

Results from the RSA's extensive programme of Irish road user research align with these international findings, demonstrating the importance of addressing these contributory factors to reduce fatalities on our roads.

Road Safety Strategy 2021 – 2030

Ireland's fifth government Road Safety Strategy 2021-2030 aims to reduce the number of deaths and serious injuries on Irish roads by 50% by 2030. This means that by 2030, we will need to reduce deaths on Ireland's roads by 50% from 144 to 72 or lower and reduce serious injuries on Ireland's roads by 50% from 1,259 to 630 or lower. If Ireland is to remain on track to achieve these goals, we must meet our Phase 1 interim targets as set out in the government Road Safety Strategy i.e. road deaths need to reduce to 122 or lower, and



serious injuries to 1,133 or lower by the end of 2024. The target for 2023 is 130 road deaths or fewer.

The strategy is also the first step in achieving the 2020 Programme for Government commitment of bringing Ireland to 'Vision Zero'. This is to eliminate all road deaths and serious injuries on Irish roads by the year 2050.

For your information, the Road Safety Transformation Partnership Board, which is chaired by the Department of Transport and comprises senior representatives of the key State bodies, is responsible for the delivery of the Road Safety Strategy. It will meet shortly to review progress in delivering strategy actions and achieving the targets set out.

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