



INSTITUTE OF THE
MOTOR INDUSTRY



The IMI's Response to the Introducing a Minimum Learning Period for Learner Drivers Consultation

May 2026

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Contents

About the IMI	4
Headline position	4
In addition to holding a provisional licence and passing a theory test, do you agree or disagree with the introduction of further mandatory requirements for learner drivers before they can take a practical car driving test?	4
If you agree, what age of learner car driver should these further mandatory requirements be applied to?	5
Do you agree or disagree that any new mandatory requirements should include a minimum learning time period between passing a theory test and being able to take a practical car driving test?	5
If you agree, how long should the time period be?	5
If we introduced a minimum time period before a learner driver can take a practical car driving test, should the validity length of the theory test certificate be extended?	5
Do you agree or disagree that new mandatory learner requirements should include a minimum number of car driving hours (with an eligible supervising driver and/or an approved driving instructor)?	6

If you agree, what should be the minimum required number of car driving hours?	6
Do you agree or disagree that new mandatory learner requirements should include a mandatory modular learning syllabus to complete?	6
Do you agree or disagree that new mandatory learner requirements should include a mandatory logbook to complete?	6
Do you agree or disagree that new mandatory learner requirements should include mandatory e-learning to complete?	7
Should some learner drivers be exempt from any new mandatory requirements for learner drivers?	7
If yes, who should the exemption/s apply to and why?	7
How should exemptions be applied?	7
Do you agree or disagree that any new mandatory learner requirements should apply to a driver whose licence is revoked for receiving 6 or more penalty points during their probationary period (Road Traffic (New Drivers) Act 1995)?	8
Do you agree or disagree that any new mandatory learner requirements should apply to a driver who has been disqualified from driving for committing motoring offences and has been ordered by a court to retake a driving test (ordinary or extended)?	8
Further comment	8

About the IMI

The Institute of the Motor Industry is the professional body for the UK automotive sector. We set the standards for technical competence in the maintenance and repair of road vehicles, and through our Professional Register and the IMI TechSafe recognition scheme we identify the technicians who are qualified to work safely on the safety-critical systems found in modern cars, including Advanced Driver Assistance Systems (ADAS), electric and hybrid powertrains, and hydrogen vehicles. Our research tracks the size of the certified workforce against the technology mix on UK roads.

Headline position

The IMI's primary remit is the technical workforce that maintains and repairs road vehicles, rather than driver training. We have nonetheless chosen to respond, briefly, because the Department is consulting on the structure of how new drivers acquire competence, and the IMI's entire policy position is that competence is the single most important determinant of road safety, whether at the wheel or in the workshop. The principles the Department applies to learner drivers should also be visible in how it regulates the technicians on whom those drivers ultimately depend.

On balance, the IMI supports the principle of a structured minimum learning period, with a mandated syllabus and a record of supervised hours. We are agnostic between a 3-month and 6-month formulation, but suggest a strong syllabus is more important than the calendar period, and that the consultation's success criteria should be set against post-test casualty data rather than process metrics.

In addition to holding a provisional licence and passing a theory test, do you agree or disagree with the introduction of further mandatory requirements for learner drivers before they can take a practical car driving test?

Agree. The IMI supports the principle of structured learning prior to a practical driving test. The current arrangement places almost no objective requirement between provisional licence and practical test beyond a passed theory test, and gives no assurance that learners have been exposed to the breadth of road, weather and traffic conditions they will face post-test. A modest set of further mandatory requirements, most usefully a syllabus and a logbook, would substantially improve readiness without imposing disproportionate cost.

If you agree, what age of learner car driver should these further mandatory requirements be applied to?

All learners, regardless of age. The IMI's view is that the road safety case for structured learning is strongest for younger learners (where casualty rates are highest in the first year post-test), but it is not absent for older learners, in fact, learners returning to driving in later life often face a vehicle technology mix that is materially different from the one they last drove. Applying the requirements universally avoids creating a two-track learner regime and is administratively simpler.

Do you agree or disagree that any new mandatory requirements should include a minimum learning time period between passing a theory test and being able to take a practical car driving test?

Agree. A minimum learning period serves both a learning function (allowing exposure to varied conditions) and a moderating function (reducing the incentive to attempt the practical test before adequate practice). It should, however, be designed to be evidenced against learning outcomes (hours, syllabus completion, logbook), not solely against the calendar.

If you agree, how long should the time period be?

The IMI is agnostic between three and six months, with a slight preference for six months coupled with a manageable minimum hours requirement, on the basis that this captures a fuller annual cycle of conditions (including winter driving, night driving and motorway exposure where age-permitted) and aligns better with the practical pace at which most learners are progressing today.

If we introduced a minimum time period before a learner driver can take a practical car driving test, should the validity length of the theory test certificate be extended?

Yes. Without an extension, a minimum learning period of six months risks pressing learners into retaking the theory test purely because of the regulatory change. Extending theory test validity to (say) three years would remove this perverse outcome. The Department should review evidence on knowledge retention to set an appropriate length.

Do you agree or disagree that new mandatory learner requirements should include a minimum number of car driving hours (with an eligible supervising driver and/or an approved driving instructor)?

Agree, with caution on supply. The IMI supports a minimum hours requirement in principle, but the Department must publish its assessment of Approved Driving Instructor (ADI) capacity alongside any minimum hours commitment. A requirement that exceeds the realistic supply of qualified instruction will displace cost onto private supervising drivers (with mixed quality outcomes) or create test-readiness inequality between learners with and without that family support.

If you agree, what should be the minimum required number of car driving hours?

The IMI suggests in the region of 40 to 60 hours of supervised driving, of which a defined minimum (perhaps 20 hours) should be with an ADI. This is consistent with figures in comparable jurisdictions and broadly with current average pre-test learning times in the UK. The hours requirement should differentiate between ADI-supervised hours and private supervising-driver hours.

Do you agree or disagree that new mandatory learner requirements should include a mandatory modular learning syllabus to complete?

Agree. A modular syllabus is the single most important element of the proposal in IMI's view. The syllabus should explicitly include modules on the safe and informed use of Advanced Driver Assistance Systems (lane keep, AEB, adaptive cruise, blind spot monitoring, driver monitoring), on the limitations of those systems, on EV-specific driving (regenerative braking, range and charging), and on basic awareness of the technician services modern vehicles require. Without this, the mandatory syllabus risks codifying the practice of a previous generation of vehicles.

Do you agree or disagree that new mandatory learner requirements should include a mandatory logbook to complete?

Agree, on a digital-first basis. A logbook (preferably a digital app, with appropriate privacy safeguards) is the most cost-effective way of evidencing supervised hours and syllabus

coverage. The Department should design the logbook to be interoperable with DVSA and ADI systems and to permit verification at the point of practical test booking.

Do you agree or disagree that new mandatory learner requirements should include mandatory e-learning to complete?

Cautious agree. E-learning is a useful complement to in-vehicle learning but should not displace it. The IMI supports mandatory e-learning modules covering theory reinforcement, ADAS familiarisation, EV-specific content and roadworthiness awareness, but recommends that completion of e-learning is treated as necessary but not sufficient for test readiness.

Should some learner drivers be exempt from any new mandatory requirements for learner drivers?

Yes, on a narrow and well-evidenced basis. Some categories of learner have legitimate reasons for accelerated or modified pathways.

If yes, who should the exemption/s apply to and why?

The IMI supports the categories already canvassed in the consultation: disabled learners (where the standard syllabus or hours requirement is incompatible with assessed need), full-time carers and people with specific employment-related driving needs (including learners entering the automotive workforce as apprentices), and certain foreign licence holders converting to GB licences. Each category should be defined in regulation, not at the discretion of an individual examiner.

How should exemptions be applied?

Through a clear statutory route, evidenced by documentation, administered by DVSA. The IMI strongly recommends that exemptions are not deliverable only via a costly bureaucratic route, which would in practice exclude the very groups they are designed to protect. Where DVSA decisions are required, response times should be published as service standards.

Do you agree or disagree that any new mandatory learner requirements should apply to a driver whose licence is revoked for receiving 6 or more penalty points during their probationary period (Road Traffic (New Drivers) Act 1995)?

Agree. A driver who has had a probationary licence revoked has, by definition, demonstrated a road safety risk in the early period post-test. Requiring them to complete the new mandatory learning requirements before re-acquiring a category B licence is proportionate, and aligns with the wider principle that competence should be evidenced in response to risk.

Do you agree or disagree that any new mandatory learner requirements should apply to a driver who has been disqualified from driving for committing motoring offences and has been ordered by a court to retake a driving test (ordinary or extended)?

Agree. Where the court has already ordered a retake of the driving test, requiring concurrent compliance with the new mandatory learning requirements is consistent with the underlying judicial finding and with road safety policy.

Further Comment

The IMI's wider observation is that the road safety case for a minimum learning period is strongest when paired with continued competence beyond the practical test. The Department should look at the evidence from comparable jurisdictions on graduated driver licensing, post-test learning and incentives for further structured training. Finally, the IMI would welcome explicit recognition in the Department's response that learner driver policy and automotive skills policy are connected: learner drivers are also a recruitment pipeline for the automotive workforce, and policies that delay or complicate the route to a category B licence should be balanced by visible pathways into apprenticeships, technician training and the wider mobility sector.



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