

DVLA Equality Analysis (EA) record sheet

The Future of Vehicle Registration and Licensing Services in Northern Ireland (NI)

1. Introduction

This Equality Analysis (EA) was carried out to consider the equality impact of the centralisation of vehicle registration and licensing services from the Driver and Vehicle Agency (DVA) in NI to the Driver and Vehicle Licensing Agency (DVLA) in Swansea, as part of wider changes to provide parity of service to NI customers.

The changes being made are outlined in detail in the full Impact Assessment “Future of Vehicle Registration and Licensing Services in Northern Ireland”. This EA considers the impact of these proposals on the NI customer base that currently access services delivered by the DVA at its headquarters in Coleraine and from eight local offices around NI. The impact on customers will be assessed in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

This EA is not designed to replace or represent an Equality Impact Assessment (EQIA) as required under Section 75 of the Northern Ireland Act (1998, 2000). A separate Section 75 screening has been produced in regard to the impact of these proposals on both customers and staff. This document is intended to focus on experiences of customers as a result of these changes.

This assessment, in part, relies on data or findings from the EA completed as part of the “Transforming DVLA Services” UK-wide consultation, as the themes, customers and potential impacts are largely the same, as well as data provided by the DVA.

The primary impacts are examined in relation to the removal of face-to-face services from the DVA’s local offices, and the ability of the DVLA to provide suitable replacement services to customers that may rely upon face-to-face support. Services currently delivered by post in NI, which will continue to be delivered by post in the future (albeit via the DVLA), are not specifically analysed since there is deemed to be no impact to customers in any/all of the protected groups.

2. Outcomes

The outcome of the changes being made will be:

- harmonisation of NI and GB vehicle services, to deliver parity of service to NI customers, except where there are differences in legislation.
- introduction of enhanced electronic and face-to-face services to customers in NI;
- centralisation of NI vehicle registration and licensing services from the DVA in NI to the DVLA in Swansea, resulting in these services no longer being delivered by the DVA's HQ in Coleraine and its network of local offices.

3. Aims, Objectives and purpose of the Policy/Process/Project/Programme

- To address the outstanding Ministerial commitment to deliver modern electronic vehicle registration and licensing services to NI customers, in line with GB services, thus significantly improving the quality of services for customers in NI.
- To create a single, UK-wide record for vehicles and keepers, together with improvements in data quality, in order to support compliance and law enforcement.
- To create a single, consistent policy platform for vehicle registration and licensing services across the UK, ensuring that such policies are implemented consistently.
- To maximise potential reductions in running costs by 2015.

4. Evidence Base

Data Sources

- A copy of the UK wide consultation published in December 2011 "Transforming DVLA services" can be found at <http://www.dft.gov.uk/dvla/consultations.aspx>.
- Responses to the "Transforming DVLA Services" consultation paper. The consultation ended on 20 March 2012 and over 1,000 comments were offered from different individuals, businesses and organisations with UK wide interests.
- Responses to the "Future of Vehicle Registration and Licensing Services in Northern Ireland" consultation.
- Consultation sessions with stakeholders to discuss specific equality issues.
- DVA Customer Satisfaction Survey 2011.
- Customer diversity questionnaire carried out across the GB local office network in May 2012.
- Ofcom 2011 Metrics Bulletin – Internet use and attitudes.
- Office for National Statistics (ONS) Census 2001 and 2011 Data.
- ONS - Internet Access - Households and Individuals, 2011.
- ONS - United Kingdom Health Statistics 2010.
- ONS The Life Opportunities Survey 2009-2010.
- ONS - Internet Access Quarterly Update 2013 Q1.

- ONS - population-estimates for the UK, England and Wales, Scotland and Northern Ireland mid-2010.
- Literacy Trust report on literacy levels in England.
- HM Treasury report on Consumer Finance.
- Disability Discrimination Act (DDA) Audit information.
- Previous EQIA conducted in 2007 relating to the Vehicles Integration: Northern Ireland (VI:NI) Project.

5. Consultation & Involvement

This EA was completed using information obtained from:

- DVA and DOENI officials and subject matter experts;
- DVLA subject matter experts;
- Customers consultation responses and GB local office questionnaires;
- Customer representative groups;
- DVLA business contacts;
- DVA business contacts and key external stakeholders (engaged via workshops and other communications).

6. Concerns/risks identified & how these have been addressed

The following specific potential concerns were noted:

Age

Data

A customer satisfaction survey was undertaken by the DVA in 2011. Among other things, age of customers was compared to the national average, as published in the NI Census 2011.

Breakdown of DVA customers and NI population by age group

Age group	DVA customers	NI population
16 - 21	3.20%	10.6%
22 - 30	10.40%	15.8%
31 - 44	25.50%	24.3%
45 - 60	33.20%	25.6%
61 - 69	15.70%	11.0%
70+	12.00%	12.7%
All persons aged 16 and over	100%	100.0%

This suggests that the DVA has a greater proportion of customers aged 31-69 than the national breakdown, with the greatest proportion of customers falling within the 45-60 age group. It also suggests that the DVA has a lower proportion of customers aged 16-30 and 70+ than the national breakdown, with the least proportion of customers falling within the 16-21 age group.

By comparison, an exercise was carried out at GB local offices across the DVLA network in May 2012 to collect data from customers¹, including age. As the table below outlines, the snapshot survey suggests that the majority of GB local office customers are within the 26-40 age range.

	16-25	26-40	41-60	61-70	71+
Sample of DVLA Local Office visitors May 2012 [percentage based on average number of customers for each year of the age bracket]	18 %	35%	27 %	17 %	3 %

Although the survey captured different age groups to those reported in the NI survey, the age ranges 16-60, 61-70 and 71+ can be used for direct comparison. However, it should be noted that the respective scopes of the GB and NI surveys were not completely aligned. For example, the GB survey was targeted at local office customers, with a greater proportion of commercial customers, while the NI survey was targeted at all DVA customers.

This notwithstanding, the GB survey shows 80% in the age range 16-60 and when compared with 72.3% in the NI survey, suggests that the proposed change would impact NI customers in this age range to a lesser extent than GB.

The GB survey also shows 20% of GB local office customers aged 61 or over, compared with 27.7% in the DVA customer base. However, when this is further broken down, the age group 61-70 has a greater proportion in GB than in NI – 17% compared to 15.7% respectively.

The greatest proportionate difference is represented in the age range 71+, where the GB survey recorded 3% of customers walking through the doors of local offices, compared with 12% responding to the DVA customer satisfaction survey. Although 12% is below the national breakdown in the NI Census (12.7%), it could indicate that customers aged 71+ could be more impacted than GB customers in that age group.

¹ DVLA local offices carried out a one-day survey across the entire Local Office Network between 15 and 25 May to help understand the equality groups represented by customers. Responses to the survey were received at DVLA Swansea from 35 of the 39 local offices.

Responses to the UK wide “Transforming DVLA Services” consultation raised concerns about the link between age and access to electronic services and these were mirrored in some responses to the specific NI consultation. 84 respondents expressed the view that older people may not be computer literate so might be unable to take advantage of the ‘more efficient’ online services proposed. For example, a motor dealer commented that “the elderly need to be able to speak to someone in person to deal with their licensing issues.” However, the statistics from the GB survey, and by inference as outlined above, the NI data, suggest that older people do not rely on the local office service more than any other age group.

The DVLA knows that its customers are increasingly turning to online and telephone services as their preferred contact channels. 62% of GB vehicle licensing transactions are carried out online, 92% of GB first vehicle registrations were made through an automated system in 2012 and around 32% of driver licensing applications were completed online. This reflects the wider trend in the UK, with more and more consumers choosing to shop online and use electronic services.

The DVLA’s local offices have now closed and the work centralised at Swansea in line with the move to increase digital channels for customers and provide greater financial savings.

According to a study by Ofcom, 80% of UK adults aged 16 and over used the internet in 2011, up 3% from 2010². The largest proportion of UK Internet users was in the 16 to 24 age group, with 98.8% of this group having used the internet. This represented 7.19 million people.³ This compares to 24% of UK adults over the age of 75 having ever used the internet. However, there is an upward trend in the number of UK adults over the age of 55 using the internet, increasing by 4% between 2010 and 2011 to 55%⁴.

Impact

The DVLA recognises that some customers may experience difficulties in using these newer forms of contact. In particular, issues may arise with some older customers, with the majority of those aged 70 and over having never used the internet⁵. As suggested by the consultation responses, some of these customers may rely on the local office to provide face-to-face assistance in completing forms, as well as preferring the counter service to complete a transaction. In lieu of a face-to-face service via the local office, the Post Office will act as an intermediary offering additional licensing services within NI to continue this face-to-face channel. Also, the DVA’s offices in NI will remain open until the end of 2014 to support vehicle registration and licensing while the new electronic and Post Office channels become established. This will include providing an “assisted digital” service to help customers through their initial electronic transactions.

² <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

³ <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html#tab-Age>

⁴ <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

⁵ <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html#tab-Age>

For more details on the services to be offered by the Post Office in NI, refer to the Full Impact Assessment document “Future of Vehicle Registration and Licensing Services in Northern Ireland”.

It could be perceived that the level of expertise within intermediary face-to-face services may be initially reduced. However, this will be addressed through earlier roll-out of additional services across GB Post Offices, staff training and service level agreements measuring performance via “mystery shopper targets”. NI customers preferring not to use the Post Office may also use the DVLA’s contact centre for advice and guidance. However, this could be considered an inferior means of communication for those customers who prefer face-to-face contact. In addition, some transactions cannot be provided through the Post Offices and instead, customers will be able to use a postal alternative as well as an online alternative, for some transactions. For older customers who prefer not to use the internet, the postal route may be considered less convenient than attending the local office, especially in the absence of face-to-face assistance. However, given that the current prevalence within NI is to use postal services – vehicle relicensing and cherished transfers being notable examples, as outlined in the full Impact Assessment – the necessity to use postal services is not considered to be detrimental to NI customers.

As a benchmark, the DVLA’s local offices offered a service standard of an average 15 minutes queuing time. The Service Level Agreement agreed with the Post Office provides a commitment to serve 80% of customers within five minutes. Any potential increase in service time may cause difficulty for some older customers who may have mobility concerns.

While the DVA’s local offices offer dedicated parking and seating that can be useful for our older customers, Post Offices may not be able to offer these services. However, by moving many face-to-face services from the 39 GB local offices, which is already completed, and eight NI offices to a wider range of Post Office and online channels, direct customer service will become available throughout most towns and cities in the UK. This may make it more convenient for elderly motorists by provision of a more localised service, whilst also eliminating the disadvantage to DVA customers who do not have a local office in their area.

An increased number of services available via 175 NI Post Office branches will mean that fewer older customers are required to travel long distances. On average there is a DVA local office within nine miles of every postcode in NI, which equates to a 24 minutes drive-time. This compares less favourably with the Post Office, which on average is within two miles and 10 minutes of every postcode in NI.

As part of the UK-wide consultation, a wide range of stakeholders and representative groups were invited to discuss these issues in more detail, to ensure the impact on various customer groups was fully understood. Discussions were held with the National Pensioners Convention (NPC) whose primary concern was to ensure that other channels remained open, so customers were not forced to use electronic channels. In

addition, the NPC stressed that the face-to-face service should be available in at least as many locations nationally with the same geographic spread.

How Addressed

1. The DVLA has considered how best to ensure that alternative channels maintain current service levels. This is set out in the main impact assessment.
2. The continuation of a paper channel and use of Post Offices to carry out face-to-face transactions will mean that those who cannot or would prefer not to use electronic services will not be left behind.
3. While the proposals may not fully meet the current preferences of a group of older customers in some respects, the DVLA believes that there is no unlawful discrimination against this protected characteristic.
4. The future reliance on postal channels for some services in NI will be less of a shift than it was for GB, since NI customers are already accustomed to dealing with the DVA by post for transactions where the DVLA did not use this channel before centralisation (e.g. relicensing, cherished transfers).
5. The DVA will offer support to customers, including assisted digital services, for a period of time following centralisation. This will help customers get used to the new electronic services and answer any queries that may arise.

Disability

Data

A customer satisfaction survey was undertaken by DVA in 2011. Among other things, those who regard themselves as having a disability or limiting long-term illness, was recorded and compared to the national average, as published in the NI Census 2011.

Breakdown of DVA customers and NI population by disability / limiting long-term illness

Disability / limiting long-term illness	DVA customers	NI population
	Yes	14.30%
No	85.70%	79%
All persons aged 16 and over	100%	100.0%

The results suggest that the proportion of disabled customers using DVA services is lower than the national average and significantly lower than the percentage of customers who do not regard themselves as having a disability or limiting long-term illness.

The following table shows the number of disabled people, including those with limiting, longstanding illness or illnesses, as a percentage of UK population by age and gender⁶.

¹
People with a disability (including those with limiting longstanding illness/es) as a percentage of the population: by age and sex, 2008/09

		16– 24 ³	25– 34	35– 44	45– 54	55– 64	65– 74	75+	16– 59/64 ⁴
All Persons	UK	7	13	19	29	41	59	14	
	England	7	7	13	19	28	40	59	14
	Wales	7	9	19	18	34	46	60	17
	Scotland	6	8	13	20	30	43	55	15
	Northern Ireland	6	7	11	21	37	41	62	15
Men	UK	7	12	18	28	42	58	14	14
	England	8	7	12	17	27	42	58	14
	Wales	..	8	14	14	36	50	57	16
	Scotland	6	8	11	19	31	46	55	15
	Northern Ireland	6	7	10	21	39	39	57	16
Women	UK	7	14	20	29	40	60	14	14
	England	5	7	13	20	29	39	60	14
	Wales	..	10	24	22	31	42	61	18
	Scotland	7	7	15	20	28	40	55	14
	Northern Ireland	6	7	12	22	36	43	65	14

1. A person with a disability is defined as someone having any limiting long-standing illness, disability or infirmity that leads to a significant difficulty with one or more areas of the individual's life.

2. A child/young person is defined as someone aged under 16, and aged 16 to 19–years who is in full time non-advanced education and living at home.

3. There may be some overlap between the 5–15+ and 16–24 age groups for reasons explained in note 2. A person will not be in both groups.

4. Age 16–59 for females, 16–64 for males.

Source: Department for Work and Pensions

For all people in the UK, the proportion of the population with a disability rose steadily from the age of 24 years, such that (59% of all people aged 75 years and over were considered to have a disability).

⁶ <http://www.ons.gov.uk/ons/rel/ukhs/united-kingdom-health-statistics/2010/edition-4--2010.pdf>

Overall, 26% of adults were identified as having a disability and are protected by the Equality Act 2010. Furthermore, 29% of adults have impairments.⁷

The snapshot survey undertaken in GB local offices suggested that around 5% of local office customers were disabled, although an additional 3% preferred not to say. This means that the figures for NI show little significant variation from the rest of GB.

Seventeen responses to the UK wide consultation raised disability concerns about the proposed closure of the GB local offices, stating that their disability causes them to rely on the local office service to help them transact, such as people with learning difficulties or those with hearing difficulties. Twelve respondents also raised concerns about disability acting as a barrier to the use of the internet. For example one private individual commented that “using a PC is harder for me than personally visiting due to visual problems” and a further respondent explained “I am dyslexic and require face-to-face consultancy.”

Several customers also raised concerns about the reliance on telephone systems due to hearing difficulties. Disabled Motoring UK suggested that in general, disabled people have lower incomes than the UK average so may therefore have less access to electronic services.

By the first quarter of 2013, 32% of disabled adults (3.7 million) had never used the internet, representing over half (53%) of all UK adults who had never used it. By comparison, of those adults who reported no disability, 9% had never used the internet.⁸ Research by Ofcom suggests that only 56% of disabled adults have internet access in their homes, compared with the UK average of 76%.⁹

Impact

The data suggests that some disabled adults will not be able to take advantage of online services as they prefer or need face-to-face channels. Post Offices will be able to offer this service for many transactions, primarily relicensing and vehicle registration services. For services not available via Post Offices or through electronic channels, customers will be required to transact via post.

It is worth noting that if an application for vehicle excise duty is made by post at the end of the month, there is an exemption in force which means that customers will not be prosecuted for not displaying a tax disc. This exemption lasts for 14 days to allow time for the new disc to arrive in the post. Following the abolition of the tax disc from October 2014 this concern will no longer apply.

Disabled customers who currently use a DVA local office or the DVA's HQ for advice and guidance will be able to ring the DVLA's contact centre. However, this may not

⁷ <http://www.ons.gov.uk/ons/rel/los/life-opportunities-survey/life-opportunities-survey/rep---life-opportunities-survey--easy-read-executive-summary--2009-10.pdf>

⁸ <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2013-q1/stb-ia-q1-2013.html>

⁹ <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

meet the needs of some customers who rely on face-to-face contact (such as customers who are hard of hearing) although facilities such as 'Text Phone' are available to help those with hearing needs.

The DVLA is looking to reduce the number of supporting documents required for transactions. This will reduce the risk of documents becoming lost in the post, improving the service offered through postal channels for those who cannot, or would prefer not to use electronic channels. Furthermore, the DVLA has streamlined its centralised processes as a result of centralising GB transactions, improving turnaround times for customers, so the postal route may not necessarily offer an inferior service. As discussed in the previous section, NI customers are traditionally more accustomed to transacting by post than GB customers.

Most DVA local offices offer car parking spaces which is important for those with mobility impairment. Not all Post Office branches may be able to offer dedicated car parking, causing difficulties for some customers with a disability. This will be offset by the higher number of branches available that will support relicensing transactions.

As a benchmark, the DVLA's local offices offered a service standard of an average 15 minutes queuing time. The service level agreement with the Post Office provides a commitment to serve 80% of customers within five minutes. Any potential increase in service time could impact some disabled customers who are unable to stand for long periods of time, especially as seats may not be provided. However, not all NI local offices currently have seating available, so this will be consistent with the current service in some areas.

Post Office branch accessibility is regularly monitored. Individual branch facilities and services for disabled customers and those with accessibility needs can be found on the Post Office branch accessibility finder¹⁰. Grants are available for sub-postmasters to improve accessibility in their branches. Accessibility is core to the Post Office Network Transformation programme.

The Post Office funds the Post Office Disability Expert Group, a panel of independent experts from a range of disability groups who advise and recommend on Post Office policy and improvements for their disabled customers and those with special accessibility needs.

By moving face-to-face services from the eight NI locations to Post Offices, access to a face-to-face service will become available throughout most towns and cities in NI. This should make it more convenient for disabled motorists and would remove the disadvantage to NI customers who do not have a local office in their area. In addition, the greater number of Post Office branches and their geographical spread may mean that fewer disabled customers are required to travel longer distances to the DVA's local offices. The more flexible opening patterns of Post Office branches may also improve the accessibility of face-to-face services for disabled motorists. Increasing the number

¹⁰ <http://pola.directenquiries.com/defaultPOL.aspx>

of services provided by the DVLA online and making them available in NI will also offer greater ease of access to customers. Customers will be able to apply by post or through intermediaries if they cannot or do not wish to access the internet.

As part of the UK wide consultation, the DVLA discussed the proposals with Disabled Motoring UK to ensure the impact on this customer group was fully understood. No particular concerns were raised. The general view was that there would be no additional burden to disabled motorists stemming from the proposals and that a better geographical spread of licensing services could offer benefits to disabled customers. It was suggested that disabled people may find it easier to access services via the internet and on the phone, rather than making a journey in person. The importance of intermediaries' provision of facilities that are accessible to disabled people was emphasised.

How Addressed

1. The continuation of a paper channel and a larger number of Post Offices to perform face-to-face transactions would mean that those who cannot or prefer not to use the DVLA's electronic services will be able to use alternatives.
2. The DVLA will ensure electronic systems are compliant with the relevant 'AA' classification¹¹
3. The DVLA will ensure that services offered by Post Office branches will be fully compliant with the Equality Act.
4. While the proposals may not fully meet the preferences of disabled customers in some respects, the DVLA believes that there is no unlawful discrimination against this protected characteristic.

Gender reassignment

The DVLA has not identified any impact on this protected characteristic.

¹¹ <http://www.dda-audit.co.uk/audit/wai-aa.htm>

Race

Data

Data is not held that identifies the race of NI customers who use vehicle services. This data was not collected as part of the DVA's Customer Satisfaction Survey in 2011. However, an exercise was carried out at local offices across the DVLA network in May 2012 to collect data of customers, including ethnicity.

Ethnic Data Considered		
	White %	Black minority ethnic %
UK ¹²	85.67	14.33
Sample of DVLA local office visitors, May 2012	84% (NB the responses were not mutually exclusive)	16% (NB the responses were not mutually exclusive)

The table above outlines the use of the local office services by customers from different ethnic groups in comparison with the UK population. This suggests that the ethnicity of GB local office customers is in proportion to the UK as a whole. It is assumed that this exercise is representative of the whole of the UK.

A study by Ofcom suggested that 78% of UK adults from an ethnic minority group have internet access in their homes, compared to a UK average of 76%.¹³ Therefore, the DVLA does not anticipate there to be a disproportionate issue with access to electronic services for this protected characteristic.

The DVLA has analysed the feedback from the UK wide consultation and the only ethnicity issue that was identified relates to language concerns. The issue of language barriers was raised by 38 respondents, as non-English speakers may struggle to communicate on the telephone, or fill in forms without face-to-face assistance.

Social demographics in parts of the UK are liable to change very quickly. As a benchmark, an estimated 0.25-0.5 million (10-20%) of all GB local office transactions involve customers who would prefer to transact in another language. In most of these cases the customer has sufficient English or uses the services of a friend/interpreter with the help of visual aids to complete the transaction with the local office clerk.

¹² Office for National Statistics Census 2001

¹³ <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

Impact

In all instances where an alternative language cannot be provided through a face-to-face channel, the customer can opt to use the 'Big Word' translation service, which will be available through the DVLA's Contact Centre.

The vast majority of 'Big Word' translations undertaken last year were for Eastern European languages. This sector could be at a disadvantage if a language service was not introduced via the Post Office. Furthermore, customers who do not speak English as a first language have difficulty understanding the DVLA's forms and processes without face-to-face guidance from a local office. However, individual branch facilities and services for anyone requiring specific translation assistance can be found on the Post Office branch accessibility finder¹⁴.

Services offered through Post Office branches often reflect the community in which they are based. This may mean that languages other than English may be available as part of normal business, but this cannot be guaranteed.

Not all services will be offered by Post Office branches and this informal translation service cannot be provided through electronic channels. As a consequence, customers who use different languages may not be able to understand the information provided to be able to meet their legal requirements, affecting compliance. However, the anecdotal view is that many customers who do not have English as their first language can read and understand more English than they are able to speak.

How Addressed

1. The DVLA's contact centre utilises a dedicated language line and will be able to assist customers who cannot transact in English. Post Offices will receive the necessary training and guidelines to support service delivery, for example advice to use 'visual aids' where required.
2. The DVLA will continue to use 'Big Word' translation service for telephone and written enquiries.
3. The DVLA believes that there would be no unlawful discrimination against customers who don't speak English as their first language.

¹⁴ <http://pola.directenquiries.com/defaultPOL.aspx>

Religion or belief

Data/Impact

A customer satisfaction survey was undertaken by the DVA in 2011. Among other things, 'community background' of customers was compared to the national breakdown, as published in the NI Census 2011.

Breakdown of DVA customers and NI households by community background

	DVA customers	Census 2011
Catholic	37.60%	45.14%
Protestant	52.60%	48.36%
Other religion	2.40%	0.91%
No religion	7.40%	5.59%
	100%	100%

The table suggests that more customers with a protestant background use DVA services than those with a catholic background; with the former group represented proportionately higher than the national statistic and the latter group represented proportionately lower. It also notes 'other religions' and 'no religions' as higher than the national average, but still in the significant minority.

For completeness, the 2001 and 2011 Census figures for religion within NI are set out below.

Religion	2001		2011	
	Number	%	Number	%
Roman Catholic	678,462	40.2	738,033	40.8
Presbyterian Church in Ireland	348,742	20.7	345,101	19.1
Church of Ireland	257,788	15.3	248,821	13.7
Methodist Church in Ireland	59,173	3.5	54,253	3.0
Other Christian	102,221	6.1	104,380	5.8
<i>(Total non-Roman Catholic Christian)</i>	<i>767,924</i>	<i>45.6</i>	<i>752,555</i>	<i>41.6</i>
<i>(Total Christian)</i>	<i>1,446,386</i>	<i>85.8</i>	<i>1,490,588</i>	<i>82.3</i>
Other religion	5,028	0.3	14,859	0.8
No religion			183,164	10.1

Religion not stated			122,252	6.8
(No religion and Religion not stated)	233,853	13.9	305,416	16.9
Total population	1,685,267	100.0	1,810,863	100.0

Given that the changes being made will result in enhanced services for all areas of NI, the DVLA is confident that the changes have a neutral impact on all religious groups within NI.

How Addressed

1. The new services provided by the DVLA online and via Post Offices will be available to all customers regardless of religion of belief.
2. The DVLA believes that the changes will not lead to unlawful discrimination against customers of different religions or beliefs.

Sex

Data

The overall data tables for NI below have been calculated from the 2011 Census of all people aged 15 and over. This indicates that the profile of gender in NI is virtually the same as the overall GB profile.

	Population over 15	Men over 15	% of Population	Women over 15	% of Population
Northern Ireland	1,456,160	705,656	48.5%	750,504	51.5%
Great Britain	50,626,774	24,641,527	48.7%	25,987,247	51.3%

<http://www.ons.gov.uk/ons/rel/census/2011census/population-and-household-estimates-for-the-united-kingdom/rft-table-3-census-2011.xls>

A customer satisfaction survey was undertaken by the DVA in 2011. Among other things, gender of customers was captured and compared to the national average, as published in the NI Census 2011.

Breakdown of DVA customers and NI households by gender

	DVA customers	NI population
Male	54.50%	49%
Female	45.50%	51%
	100%	100.0%

This suggests a greater proportion of DVA customers are male than female.

The snapshot exercise undertaken in GB local offices in May 2012 also suggests that significantly more males use GB local offices than females. However, there is no evidence of a gender specific reason for this. This was not raised as an issue during the consultation.

Other Gender Data Considered		
	Female %	Male %
UK ¹⁵	50.8	49.2
GB Driving Licence holders	46.7	53.3
Sample of DVLA local office visitors, May 2012	26%	74%

It is worth noting that by the first quarter of 2013, men were more likely to have used the internet than women, with 88% of men having used it compared with 84% of women.¹⁶

Assuming the gender split suggested by both the DVA's customer satisfaction survey and the DVLA's snapshot exercise is representative of both the GB and NI local office customer base, more men than women will be directly affected by local office closure but they will not be specifically disadvantaged.

How Addressed

1. Increasing the number of services provided by the DVLA online may offer greater ease of access and customers will still be able to apply by post or through Post Offices if they cannot or do not wish to use the internet.
2. The DVLA is considering how best to ensure that the alternative channels maintain current service levels. This is set out in the main impact assessment.
3. The DVLA believes that the changes will not lead to unlawful discrimination against customers of different genders.

Sexual orientation

No impacts have been identified.

Marriage or civil partnership

No impacts have been identified.

¹⁵ <http://www.ons.gov.uk/ons/rel/pop-estimate/population-estimates-for-uk--england-and-wales--scotland-and-northern-ireland/mid-2010-population-estimates/rtf---mid-2010-population-estimates-poster.pdf>

¹⁶ <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2013-q1/stb-ia-q1-2013.html>

For completeness, these stats from the DVA Customer Satisfaction Survey 2011 are included here.

Breakdown of DVA customers and NI households by marital status

	DVA customers	Census 2011
Married/Civil partnership	65.50%	48%
Single	22.10%	36%
Divorced/Separated/Dissolved	7.80%	9.20%
Widowed	4.60%	6.80%
	100%	100%

Pregnancy and maternity

No impacts have been identified.

Carers

Data

A customer satisfaction survey was undertaken by the DVA in 2011 with this data captured and compared to the national average (where it was available), as published in the NI Census 2011.

Breakdown of DVA customers and NI households by care responsibilities

Dependents	DVA customers	NI households
Care of a child / children	70.10%	33.9%
Care of a person with a disability	16.10%	N/A
Care of an elderly person	13.80%	N/A

No statistics have been produced which provide a breakdown of people providing unpaid care in the UK, although this is estimated to be around 13%.¹⁷ It is generally recognised that there is a link between gender issues and dependants, as statistically women are more likely than men to have dependants or caring responsibilities.

Impact

Travelling times to the DVA's local offices may cause customers with dependants to incur additional care costs or require changes to their working patterns to balance work/life commitments. However, additional services will be available at a wider range of Post Office branches or by post. Travelling time is likely to be reduced therefore benefitting customers with dependants.

While some DVA local offices may offer seating for customers, which can be useful for those with dependants, it is accepted that Post Office branches may not offer customers a seated waiting area. Most DVA local offices offer car park spaces which can be important for those with dependants. Post Office branches may not be able to offer this dedicated car parking, which could cause difficulties for some customers.

In their response to the UK wide consultation, Carers UK emphasised that carers are generally very pushed for time and can find face-to-face transactions particularly burdensome. Therefore, introducing more electronic services, available 24 hours a day, seven days a week, would be highly beneficial for this customer group. However, they felt that the proposals must be balanced to provide for those who do not have internet access.

¹⁷ Source: ONS Census, 2001

The DVLA believes that the changes will not lead to unlawful discrimination against customers with caring responsibilities.

How Addressed

1. Increasing the number of services provided by the DVLA online will offer greater ease of access and choice to customers with caring responsibilities.
2. Carers will continue to be able to apply by post or through Post Office branches if they cannot or do not access the internet.
3. By moving many face-to-face services from the DVA's local offices to Post Office branches, direct customer service will become available throughout most towns and cities in NI. This may make it more convenient for carers by provision of a more localised service, whilst also eliminating the disadvantage to carers who do not have a DVA local office in their area.

Illiteracy and customer service

DVA customers who are unable to read or write may currently rely on face-to-face customer service staff to help them to complete their applications.

The Literacy Trust estimates that around 16% or 5.2 million adults in England can be described as "functionally illiterate". They would not pass an English GCSE and have literacy levels at or below those expected of an 11-year-old. They can understand short straightforward texts on familiar topics accurately and independently, and obtain information from everyday sources, but reading information from unfamiliar sources, or on unfamiliar topics, could cause problems.¹⁸

The Department for Employment and Learning NI published a report in February 2010 entitled "Study to identify how 'literacy' levels have developed over time". The key observations from the trend analysis included an indication that literacy standards have improved faster in NI than the other UK countries between 1996 and 2009¹⁹.

Around 10% of respondents to the UK wide consultation expressed concerns about literacy barriers in completing forms and understanding processes in the absence of face-to-face support. There was concern expressed that if the local offices closed, Post Office branches may not provide the same level of support to customers who need assistance to complete applications. This may cause further difficulty for customers who rely on face-to-face assistance in understanding guidance and completing forms. These customers would need to use the DVLA's contact centre or get support from friends/family/colleagues.

¹⁸ www.literacytrust.org.uk/about/faqs/284_how_many_illiterate_adults_are_there_in_england

¹⁹ http://www.delni.gov.uk/del_ni_literacy_trends_final_report_11_02_2010_-_final_report_9_7_10-2.pdf

How Addressed

The DVLA is considering whether face-to-face services provided by Post Office branches could continue to provide the current level of support to customers with literacy issues.

The DVLA will ensure electronic systems are compliant with 'AA' classification to make information more straightforward, helping those with lower literacy levels.

Social inclusion - accessibility to services for those without bank accounts

Data

A 2010 Financial Inclusion report by HM Treasury states that there are 1.75 million adults in the UK who do not have a bank account²⁰. The research also showed that while many unbanked consumers express a preference for managing their finances in cash, a quarter (26%) have numeracy or literacy problems, and one in 10 (11%) live in ethnic minority households. Taken as a percentage of the UK adult resident population, 3.54% of UK adults do not have a bank account, although it is not known how many of these would need to use the DVLA's services.

Impact

As with DVLA's local offices, the DVA's local offices accept cash payments and their closure could affect those who are unable to pay for their services by credit or debit card. It has been accepted that cash payments would not be possible if purely electronic customer service channels are introduced. The Post Office is able to accept cash payments.

How Addressed

1. As is currently the position, for customers who cannot or do not want to pay for their transaction by credit/debit card, the DVLA would continue to accept postal orders with all postal vehicle transactions.
2. Post Office branches will accept cash payments.

Social inclusion - accessibility to services for those without access to the internet

Data

In 2011, 76% of UK households had access to the internet. The 24% without internet access could be due to geographical location, cost of computer, cost of internet, IT illiteracy or personal preference. According to a study by Ofcom, less than half (49%) of UK households on a low income have access to the internet²¹. The ONS quarterly report for

²⁰ http://www.hm-treasury.gov.uk/fin_consumer_fininclusion.htm

²¹ <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

Q1 2013 states that 79% individuals in NI used the internet compared with the UK wide average of 86%²².

On 7th May 2013, NI Agriculture and Rural Development Minister Michelle O'Neill announced²³:

“I am committing £5million to the delivery of broadband that will be used exclusively to target rural areas of high deprivation across the North that currently have no fixed wire infrastructure to access broadband. I hope that this funding will stimulate companies supplying broadband to get out into rural areas and use this infrastructure to provide access for rural dwellers and businesses to use broadband. I want this investment to stimulate rural businesses and give rural dwellers a wider access to services via broadband.

“This investment will bring my Departments total investment in rural broadband to £7.5million and will hopefully in the future see many of the some 37,000 rural premises that don't have access to fix wire broadband getting connected.”

Impact

The majority of relicensing services currently offered by the DVA's local offices would be made available through Post Office branches. However, several services will only be available through electronic services or a postal route. Customers currently used to transacting face-to-face, and unable to take advantage of more online services, would have to rely on the postal channel, which may be considered more inconvenient and less reliable than the current face-to-face experience.

How addressed

1. While customers without access to the internet will be unable to take advantage of online services, they will still be able to use Post Office branches or a postal channel.
2. Face to face services provided at Post Office branches will continue to provide the current level of support to customers. This includes support for those who need help to understand and complete forms.

²² <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2013-q1/stb-ia-q1-2013.html>

²³ <http://www.northernireland.gov.uk/index/media-centre/news-departments/news-dard/news-dard-may-2013/news-dard-070513-oneill-announces-5m.htm>