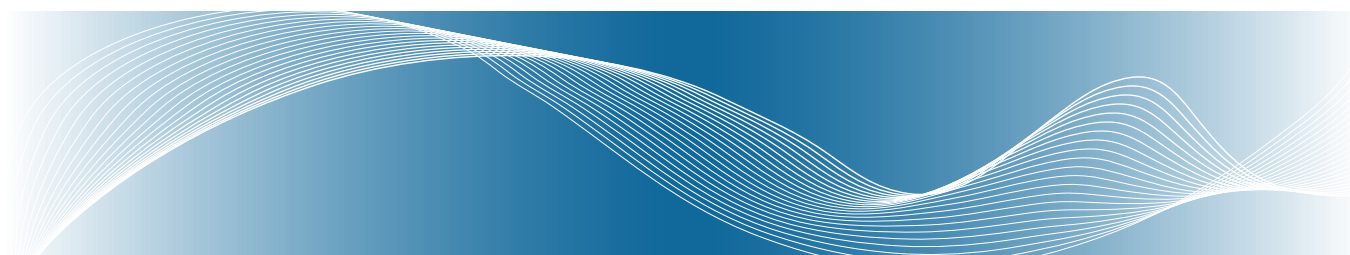




Transforming DVLA Services

Review of the findings of the DVLA Corporate Affairs Team



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1. Introduction and Structure of our Report

1.1 Background

On 13 December 2011, the Parliamentary Under Secretary of State for Transport, Mike Penning, announced a consultation on a programme of work to transform the way that the DVLA delivers its services to customers. This included a formal written consultation, which was open until 20 March 2012, and in parallel a series of meetings and workshops with trade groups.

The premise behind the exercise was that DVLA could serve its customers more efficiently and in many cases better by centralising services at Swansea and by providing more choice and flexibility around how and when motorists deal with the Agency. This improved choice and flexibility would be provided through greater use of electronic channels and through partnership with others (intermediaries).

The DVLA's Corporate Affairs team was asked to consider carefully all comments received in response to this exercise. This evidence base is crucial for the Agency to develop robust plans to make it easier for motorists to carry out their business with the DVLA and to deliver: service improvements; better value for money; a faster, more responsive service, and greater productivity from the DVLA's workforce.

To aid this consideration, and to ensure transparency for those Agency staff members potentially affected by the plans to change, the analysis of the comments undertaken by DVLA's Corporate Affairs team was reviewed by a second, separate group.

1.2 The Review Team and its terms of reference

This second group – The Review Team - comprised a number of Agency staff under the leadership of a non-executive Director of the Agency. The group includes staff from the operational side of the network services team, the regional enforcement centre team and the contact centre team. Members of the group acted in a personal capacity based upon knowledge of current services and customer expectations.

The terms of reference of the Review team were:

“to validate and assure that the conclusions reached by the Corporate Affairs team, based on their analysis of the comments received are evidence based, reasonable and fairly drawn.”

The Review Team had access to the same information available to the Corporate Affairs team. It worked independently but received good co-operation from the Corporate Affairs team, and prompt responses to requests for information.

For ease of reference we refer to the Corporate Affairs team as ‘the consultation team’ throughout the remainder of this report.

1.3 Structure of this report

This is the report of the work of the independent Review Team. Following this brief introduction the rest of the report is structured as follows:

- | | |
|------------------------|--|
| Section 2 | Provides a short executive summary |
| Section 3 | Explains our approach to the review and describes the work undertaken |
| Sections 4 – 11 | Considers, for each group of respondents to the consultation, the evidence and sets out the extent to which reasonable and fair conclusions were reached |
| Section 12 | Provides a check-list of the key issues which the Review Team believes have to be answered fully before any decision is taken to press ahead |
| Section 13 | Although not strictly in our terms of reference, this section includes some possible ways forward in tackling the issues raised by section 12. |

2. Executive Summary

The Review Team is generally content that the consultation team has drawn conclusions that are evidence based, reasonable and fairly drawn.

The consultation team's own executive summary has identified correctly that four fifths of respondents do not support DVLA's proposed changes. It emphasises that nearly a half of respondents mention their desire to retain a way of dealing with DVLA face to face, whilst a third point out the value added by local office staff, and the expertise they bring. Although some two fifths of respondents either use electronic services now, or are keen for a future expansion, these are often seen as complementary to the local offices rather than as alternatives to them.

The consultation team identified how a quarter of respondents are concerned that alternative channels will not be able to deal with complex transactions or provide a sufficiently speedy turnaround. A fifth of respondents are nervous that, should DVLA proceed to close local offices, the organisation will not be sufficiently prepared for the change. Even if changes are implemented smoothly, other respondents worry there will still be groups who are disadvantaged by their inability to access electronic channels.

We agree that these are key themes coming out of the evidence.

Whilst we are broadly in accordance with these conclusions by the consultation team, we would also highlight the following:

- a. The report of the consultation evidence has summarised the responses quantitatively, with supporting quotations to provide a flavour of the responses. There is little mention of the position of key national groups who represent key constituencies (e.g. the Road Haulage Association, the Association of Chief Police Officers). Throughout our report we have tried to summarise the position of key interests. These should be looked at further by the Corporate Affairs team and reflected in any updated report.
- b. In terms of different categories of respondent, we felt that the consultation team for the most part have picked up the main issues raised. However, we felt that the consultation team did not capture the depth of concern on the part of some key police interests, which need to be addressed carefully.
- c. In addition, it perhaps slightly overstated the support amongst 'interest groups' and included in this category a diverse group of organisations whose views were not easily aggregated. These views need to be unpicked somewhat, with the responses of some major players discussed under relevant headings.
- d. The consultation team has done a good job in summarising the concerns of employee respondents, whose view show great concern about the quality of service to customers as well as their own employment situation. We also highlight the comprehensive and detailed response submitted by PCS.

- e. Although the consultation team have been generally successful in summarising the views of key groups (private individuals, dealers, fleet, etc) their report makes it difficult to keep track of the key transactions - across all groups - that are raising most concerns. In section 12 of our report we provide a summary checklist of the key issues which management needs to address.
- f. In terms of thematic issues we think that the consultation has failed to elicit altogether clear views on the role that might potentially be played by intermediaries. This is likely to reflect the fact that the proposals were not highly specific on what this could mean in practice.

To obtain a summary of the key issues raised by the consultation in DVLA transaction terms, readers are referred to section 12.

3. Our Approach to the Review

3.1 Overall approach

The key task assigned to the Review Team was to establish that conclusions drawn by the internal consultation team were 'reasonable, objective and evidence-based'. Our overall approach to fulfilling this remit had two elements:

Firstly, we established whether we could be confident in the accuracy of the underlying data that the Review Team used to support their conclusions. To do this we carried out a review of a sample of responses to ensure that the consultation team had summarised the responses they had received in a systematic and fair way.

Secondly, we formed a view on whether the consultation team had interpreted the evidence in a reasonable and objective way. To do this we analysed the data relied upon by the consultation team and compared our findings with those summarised in the final report of the consultation team.

These two elements of the work are described further below.

3.2 Establishing confidence in the data

The DVLA consultation team had developed a coding frame which they used to log the incidence of particular issues mentioned in the consultation. This allowed the 1000-odd responses received – which contained a wide variety of views expressed at different levels of detail - to be analysed in quantitative terms. This was important to make the data manageable, and to allow conclusions of the form “30% of private individuals responding were worried that closure of the local office would lead to delays”.

We were keen to establish that the coding frame was comprehensive (i.e. did not miss issues) and that responses had been coded systematically (i.e. that the issues mentioned by respondents had not been neither significantly under-recorded, nor over-recorded). We therefore analysed a random sample of 50 consultation responses using the coding frame developed by the consultation team, and then compared our results with those of the team.

This comparison exercise showed, for the sample of responses selected, a high correlation between the results produced by both teams. There were inevitably differences in the recording of issues at the level of **individual** responses where, in the opinion of the Review Team, the consultation team had omitted to record an issue mentioned, or perhaps interpreted comments to allude to an issue where a more cautious approach was warranted. However, **across the sample as a whole** these errors of omission and commission, for the most part, tended to cancel each other out.

The analysis did suggest that:

- The consultation team had slightly tended to understate the extent to which respondents were open to greater use of intermediaries and the internet.
- The consultation team had slightly tended to overstate the extent to which respondents felt the local offices provided added value, and the concerns of respondents about DVLA preparedness for change.

However, the most significant difference between the teams concerned a variable on the coding frame to capture whether a respondent mentioned that they wanted to retain the status quo (i.e. keep local offices open). The consultation team appeared to under-record this element. We therefore advised the consultation team that in writing up their report they should instead rely upon another set of responses which were captured accurately and amounted to the same thing (responses to the question 'do you support DVLA's direction of travel'). The consultation team adopted this approach and we are therefore confident that the balance of opinion on this key issue has not been misstated.

Overall, we are confident that consultation team has summarised the data from the consultation in a reasonable way and has a good evidence base to rely on.

3.3 Analysing the data, and comparing our findings with that of the corporate affairs team

Having established basic confidence in the data being used by the consultation team, we examined whether this data had been interpreted in an objective and reasonable way. To do this we:

- a) carried out our own analysis of the quantitative summary of the consultation responses, then comparing our findings with those of the consultation team
- b) reviewed in detail some 50 submissions by 'major players' – generally organisations who by virtue of their size had frequent dealings with DVLA, or who represented a large number of organisations or individuals who did so
- c) reviewed the write-up of a series of consultation workshops which DVLA carried out with key interests

The purpose of b) and c) reflects the fact that a consultation is not simply a matter of understanding how widespread the support for a proposal is, or any concerns associated with it. It is also important to draw out the reasons why a particular view is put forward, the detail behind particular issues and what this means for the way a proposal is implemented. The activities b) and c) were important to get this more granular view, which in turn informed our assessment of whether the consultation team had drawn the right conclusions from the evidence put before it.

The results of this work are summarised in the remaining chapters (4 -11). The following groups of respondents are considered:

- Private individuals
- Dealers
- Interest groups
- Transport and Logistic Organisations
- Fleets
- Local Government
- Employees
- Emergency services and other public sector organisations

Further sections, 12 and 13 take a view across all groups to highlight the principal practical challenges for management.

4. Private Individuals

4.1 Summary

Overall the Review Team thinks that the conclusions presented in the report of the consultation team are reasonable and reflect the evidence received by the consultation exercise.

4.2 Our analysis of the evidence

The Review Team independently reviewed the consultation evidence and arrived at a similar set of findings to the internal team.

Of the 505 private individuals responding to the consultation, more than 80% were against the Agency's current direction of travel.

“LO provide valuable face to face service to the public. Staff in LO have a lot of knowledge and experience which will be lost. This may have an impact on DVLA's reputation, accuracy and customer satisfaction. Face to face preferred method and often difficult to speak to call centres.” (Response 61)

Private individuals tend to value the face to face service (33% citing this issue) and comment favourably on staff knowledge and their ability to help customers resolve their problems. Those who are worried about local office closure tend to be concerned about:

Reduced access: including the risk that without a local office certain groups would struggle to access DVLA services, including the elderly, those unable to access a computer, as well as people with literacy difficulties, language barriers and the disabled. Over a third of respondents mentioned one or more of these factors

A deterioration in service quality: in particular, a fifth of private customers were worried that their transactions would not be turned around quickly enough and 12% that paper documents might get lost in the post. Security and information quality was mentioned as a potential concern by 12% of respondents

There were also reservations that other channels could not provide the same degree of service.

“Vulnerable members of society will be negatively affected, such as the elderly, disabled, people with English not as their first language with the closure of [Local Offices] it would be anticipated that increasing numbers of customers would be forced into carrying out their queries with the call centre. The Local Offices provide face to face contact with the DVLA and are able to help with complex enquiries which cannot be resolved over the telephone.” (Response 975)

A third of private customers recognise that simple transactions could be dealt with through electronic channels but there was scepticism that such channels were appropriate for more complex transactions. Although a quarter of people positively embrace electronic channels there were also concerns over the quality of the user experience when transacting electronically (mentioned by 14% of private customers)

“I would use these for straightforward transactions, but I do not feel that I trust them in more involved or complex enquiries”. (Response 535)

Nearly a fifth of respondents emphasised that, if intermediaries were used, it was vital that they had knowledgeable, capable staff. However, whilst few were enthusiastic about an expanded role for intermediaries, nor was there much hostility to the idea (with only 14% stating their antipathy). It is possible that respondents found it difficult to come to a clear view on this issue without more detail on who the intermediaries would be, and what exactly they would do.

A minority of those opposed to the closure of local offices were concerned about job losses (11%) or the impact on local economies (5%). The major concern is about the practicalities of doing business with the DVLA. Over a fifth of respondents stated a concern that the DVLA would not be ready in time with alternative channels, should it proceed to close the local offices.

4.3 Further Points noted by the Review Team

Interestingly, evidence provided by the AA mentioned that they had solicited the views of around 20,000 members. 83% of respondents had used the online services of these 87% rated DVLA online good or very good and supported delivery of services online, however 50% would oppose 'only online services'. Overall 45% would support or not oppose third parties carrying out DVLA services, 53% of the survey responses were opposed the closure of local offices, 31% of those strongly. The AA survey and the consultation appear to be broadly consistent.

Our analysis is therefore broadly consistent with that of the internal review team. It means that we believe that the conclusions reached by the internal review team generally reflect the views submitted in the consultation by the general public.

5. Dealers

5.1 Summary

Overall, we believe that the consultation team have accurately captured the views submitted to it by the 274 dealers who responded to the consultation. There are some minor points of clarification and amplification, which are set out below.

5.2 Our analysis of the evidence

Overall some four fifths of the 274 dealers responding to the survey were opposed to the Agency's direction of travel. In addition, the PCS response mentions that it surveyed some 1600 dealers and found the 'overwhelming majority in favour of retention of the local office network in its current form'. The Society of Motor Manufacturers and Traders (SMMT), a key interest group, was however more supportive of a shift to electronic transactions albeit with important qualifications (discussed below).

Our analysis showed that 40% of dealers thought that the loss of the local office would mean that they would experience a worse service and could result in a loss of business. The most frequently mentioned specific concerns were:

- Changing the tax class of a vehicle (cited by 33% of dealers)
- Delays in receiving a disc following taxation of a vehicle (30%)
- Cherished Transfer administration (28%)

These concerns involved both the speed of the service (with 32% mentioning worries about turn around), and in some cases the extra work that alternative processes might require of them. We note the importance attached by some dealers to the value of a same day service, to avoid frustrating their customers. These conclusions were also drawn by the consultation team.

The consultation team also concluded correctly that a significant proportion of dealers were open to doing more business electronically (some 36% mentioned this, as did the SMMT). However, their conclusion that 'the dealers favoured the use of electronic channels as opposed to intermediaries' is too stark, as some 23% of dealers were favourably disposed to the idea of an increased role for intermediaries. The SMMT for example canvasses the idea that "it might be possible to allow dealers to re-licence used vehicles" and may "act as information points for members of the public needing to access advice or information on registering vehicles".

5.3 Further points noted by the Review Team

Whilst we are generally content with the conclusions drawn by the consultation team, we would attach somewhat more emphasis on the nervousness in parts of the dealer community that DVLA is unready for the change, and that it must 'raise its game' if it decides to close the local offices.

For example, many dealers are open to proposals to allow more transactions to be carried out by electronic channels. However, there is an absence of the confidence in the DVLA to be able to put these in place rapidly enough.

“ The DVLA have a history of not being able to deliver online solutions in the past” & “We have concerns that the DVLA will not be able to implement these changes as there have been a number of projects in the past that they have simply failed to deliver” Response 937 (Dealer)

Some 30% of individual dealer respondents cited this concern. The SMMT also emphasised this issue. Whilst they see a continued shift to on-line services as welcome they fear that this change would require considerable time to implement.

“A major concern would be the interim transfer of processes to be handled centrally by post, which from industry experience would present challenges for all customers, particularly through delays causing lost sales, data security, and accuracy of record. We call for any such temporary and postal arrangements to be avoided” SMMT Response 982

The SMMT go on to say that where a postal channel is part of the final solution trade should have a more robust, faster level of service than that currently provided by DVLA Swansea to the public. In this respect, it is interesting that a fifth of dealers mentioned a concern about documents going missing in the post.

The SMMT also canvasses some more fundamental changes to modernise DVLA services, including abolition of the tax disc and an end to the regionalised number plates.

The consultation also suggests that the closure of the local office will place a premium on a high quality telephone service (this factor is alluded to by the consultation team which mentions that one third of dealers had struggled to deal with DVLA on the phone).

6. Interest Groups

This group consists of a diverse range of organisations including car owners clubs, disability groups, carers groups and the main trade union representing DVLA staff, the PCS. Whilst this group includes the PCS response it is felt that it would have been more appropriate to include this response under Employee category as the union is representing 70% of agency staff. Generally we thought that this section aggregated together some diverse interests, whose different perspectives could have been drawn out separately.

6.1 Summary

The consultation team conclude in the report that “nearly half [of this group] fully or partly support the changes” is perhaps misleading. Some 55% of interest groups unambiguously state their opposition, whilst 19% state clearly they are in favour. Analysis of the remaining 26% of responses suggest that many are simply unclear about what the proposals mean, whilst some have significant misgivings. In these cases the term ‘partly in favour’ may not capture the position adequately.

Looking at the detail behind this conclusion, the consultation team seem to have identified many of the points raised for and against the proposals. This is discussed further below.

6.2 Our analysis of the evidence

We shared the conclusion of the consultation team that the most marked concern, mentioned by a third of groups concerned digital exclusion. Overall a third of respondents explicitly mentioned that they valued face to face services, and did not want to lose them.

“Internet is not a substitute for personal service, some things can’t be done online and some people are not online”. (Response 252)

“The existing services work well for those familiar with the internet, but there is still a significant percentage of the population who do not use the internet.” (Response 567)

However, the picture was not uniform and, as the consultation team noted, some groups recognised the potential of electronic transactions to improve service accessibility. This led to a desire for more electronic services, including from disability groups.

“Technology which allows services to be provided 24hrs a day 7 days a week, are incredibly important and actually give a certain group of carers better and greater accessibility than they would otherwise have. The degree to which you are able to move more services online, will increase many carers access to those services and make things much easier and more convenient. In other words, there would be a positive equality impact”. (Response 884)

“All services that can feasibly be done online should be offered online”. (Response 887)

Just under a third of the interest groups could be categorised as car clubs, or organisations specialising in the restoration of historic vehicles. These groups tended to want to retain the local office. Some of their concerns – as the consultation team noted – related to the value of face to face interaction, particularly in the case of validating original documents and processing complex transactions.

“When importing historic/classic vehicles this involves the production of documents which can be scanned and authenticated or presented in person. This cannot be done electronically and would involve a postal application, which the associated risk of irreplaceable documents being lost and inevitable delay.” (Response 567)

“Who will authenticate documents? Who will inspect vehicles needing age related numbers? Who will tax historic vehicles for the first time? Who will inspect imported vehicles needing UK registration?” (Response 519)

The ability of Swansea to resolve complex queries over the phone was also doubted.

“I have always found my local office and other offices I have dealt with extremely helpful and willing to solve any problems. By contrast the centralised phone system is fine for routine queries but once questions get away from the prescribed procedures failure is inevitable.” (Response 537)

Some of these groups feared that their members would be unhappy or unable to transact electronically, either on-line or via the telephone. These concerns were similar to those involving digital exclusion, mentioned above.

“We have about 1500 members in the UK, many of whom are aged 60 or over and do not have access to the internet. Your proposed changes will make it significantly more difficult for them to access the services they need.” (Response 779)

Across all the interest groups around a fifth said that they did not favour an expansion of the role of intermediaries whilst a slightly smaller proportion (15%) said they saw the potential. This lack of a strong view may have reflected uncertainty about how exactly the arrangement might work.

“If the inspection of vehicles is to be carried out by approved intermediaries, who will they be? By what criteria will they be selected? Who will pay for this service, which is only done at the behest of DVLA? If done by non-DVLA staff, what measures can be put in place to prevent fraudulent inspections taking place”. (Response 810)

6.3 Further points noted by the Review Team

The above conclusions are largely consistent with those of the consultation team. We are broadly content with their conclusions although we would summarise the position as characterised by the fact that the majority of bodies are against the proposals or have important reservations. These tend to be smaller organisations. There are, however, a number of major national organisations whose are supportive. These include the AA, the British Parking Association and Disabled Motoring UK.

We discuss the views of major haulage, rental car and motor trading associations under the relevant chapters elsewhere in this report. We discuss the views of the PCS under the chapter on employees.

7. Fleets

7.1 Summary

Overall, we believe that the consultation team have accurately captured the views submitted to it by the 27 fleet organisations who responded to the consultation. There are some minor points of clarification and amplification, which are set out below.

7.2 Our analysis of the evidence

Our principal conclusions are that:

- The majority of fleet respondents (68%) are opposed to the proposals
- The biggest concern (cited by 56% of respondents) is the potential for delays in the issuing of tax discs which could result in some circumstances in a failure to meet a legal requirement
- Half of the respondents also state that there is currently no on-line or post office alternative to the local office because of the specialised nature of the vehicles they operate
- Over a third of fleet respondents highlighted their concern about arrangements, in the absence of a local office service, for checking documents (e.g. they were concerned about the potential for loss in the post)
- Whilst a half of respondents are open to more on-line transactions, there are concerns that this will lead to them incurring extra costs as many only have access to credit cards, for which there is a fee per disc, or will have to raise multiple cheques for different applications as they do not have access to any cards. By transacting either online, over the phone or with other intermediaries, those that presently have pre-funded accounts with the local office may lose a convenient payment facility.
- Some fleets also expect to be offered the ability to carry out bulk transactions on-line as they have to register and tax multiple vehicles every month. Using the on-line EVL service in its current form (which is vehicle by vehicle) would generate significant extra work for them compared to the provided by the Local Offices

Our conclusions were therefore largely consistent with that of the consultation team.

7.3 Further points noted by the Review Team

In addition the Review Team identified a number of further points worthy of note.

Some fleets expressed concern about the viability of on-line vehicle licensing as generally fleet insurances appear on the MIB database only if details are entered separately for each individual vehicle. Therefore this may prohibit them from undertaking licensing transactions online.

About a third of fleet respondents mentioned that they were open to further services being provided by intermediaries. However, several were concerned about the quality of staff or that it would result in them having to pay extra costs.

The British Vehicle Rental and Leasing Association, who's "members alone manage over 5 million separate paper transactions with the DVLA each year", support a major expansion of electronic channels and although do not mention Local Offices specifically, they have proposed a number of far reaching proposals that include :

- Removing the need to produce or display a VED disc
- Introduce multi year VED for fleet operators
- Remove all paper notifications
- Efficient means of refunding and purchasing VED electronically
- Suppression of the V5C and on demand service
- Electronic application for Duplicate Tax Discs
- Electronic acknowledgment of V5 receipt and opportunity to do in bulk
- Simplify and automate cherished number plate transfers
- Use of pre-funded account system, Direct Debit or BACS payments
- Complete and submit DVLA forms electronically
- Electronic V712 notifications
- Automatic fleet licensing for vehicles over 3yrs old, also extended to include HGV's
- They have also expressed concern regarding Diplomatic vehicles and require assurance that there will be a continuity of service at a national level

8. Local Government

8.1 Summary

This category comprised 23 respondents, mainly local authorities or constituency MPs. Just over a half of respondents stated that they were clearly against the proposals. Some 16% were unambiguous supporters, whilst 32% were potential supporters if various conditions or caveats were met. Our analysis drew a similar set of concerns to those identified by the consultation team.

8.2 Our analysis of the evidence

We noticed a number of general themes running through the responses from this sector. Two fifths of respondents were keen to see an increase in the spectrum of electronic services; however there were also concerns about issues relating to digital exclusion.

“Online services are only applicable to those with Credit and Debit cards which we do not have use of.” (Response 515)

“With 51% of the population still choosing to handle their business with the DVLA in person, it is obvious that a majority of the population are reluctant to use the electronic or telephone options.” (Response 753)

A third of respondents commented specifically about the negative impact that closure of the Local Office would have on the surrounding community and businesses.

“Closure of the well used LO will have a negative impact on the county as a whole and the town in particular as the [visiting] public provide a welcome boost to our local businesses.” (Response 226)

Additionally, some perceived that the closure of the Local Offices would lead to an increase in non-compliance, even if this was not the intention.

“Reduction in service levels, loss of income through more difficult process for cherished transfers, weaker enforcement in vehicle licensing leading to an increase in fraud.” (Response 980)

Two fifths of respondents mentioned that local customers valued face to face contact and benefited from the knowledge and ability of the local office staff. A quarter had concerns about the alternative channels that are being considered to replace the local office and the quality and security of any services provided through intermediaries.

“Intermediaries do not offer the same level of service as dedicated offices, especially for commercial operators wanting to tax a number of vehicles at the same time”. “Intermediaries (Post Office) are unlikely to be set up to deal with commercial organisations that want to tax multiple vehicles at the same time. If they do offer the pre-funded account service, will there be a charge? And will there be protection in the event of the intermediary ceasing to trade?” (Response 515).

“I have serious concerns about the type of intermediaries that will be utilised in addition to the Post Office. I feel that stringent checks will need to be made to ensure that items such as authentication stamps, tax discs and vehicle documents are not put at risk by providing services through intermediaries.” (Response 753)

Finally, just over a third of respondents expressed concerns that adequate alternative arrangements would not be in place following the closure of the local offices:

“It is important that new IT systems, processes are thoroughly tested beforehand so that the “bugs” can be ironed out; if the new systems and processes were found to fall short after “Go Live” the credibility of the whole DVLA record keeping/reporting process (right the way through TpT appeals/TEC and bailiff debt collection action) could be severely damaged as far as the whole TMA enforcement action goes.” (Response 548)

8.3 Further points noted by the Review Team

Our analysis of the concerns raised by Local Government is consistent with that of the consultation team. We are therefore support the conclusions that they have made in respect of this category of respondent.

9. Transport and Logistics

9.1 Summary

Our analysis of the evidence supports the conclusions drawn by the consultation team about the views of this group. However, we also highlight the views of the major representative associations, The Freight Transport Association and The Road Haulage Association, who responded to the consultation.

9.2 Our analysis of the evidence

Nearly four fifths of those who responded were not in favour of the proposed changes. Around a third pointed out that they were unable to complete their transactions through the post office or internet, and a similar proportion expressed their worry about an increase in delays. Key transactions mentioned were:

Issue	Example
Urgent transactions (e.g. needed to be completed to keep a vehicle on the road)	<i>"I can go to my LO to tax a vehicle last minute, even get a replacement if a disc goes missing, which means I can keep vehicles on the road without having to wait for replacements to come through the post."</i> (Response 137)
Bulk licensing	<i>"The facility to tax multiple vehicles at the end of each month will be hard if we have to do this on line and other individual technical issues we have been able to remedy over the counter and will now have to be resolved by constant letter writing."</i> (Response 54)
Complex transactions	<i>"What do you do if you have a non-standard query - send it all to Swansea to be lost in the system, spend an hour on an automated service that still doesn't give you the option you need, or go and speak to a human? You opt to speak to the human".</i> (Response 290)

Around a quarter of respondents said they would welcome an increase in electronic services but some had concerns over transactions which were not currently catered for online by DVLA. Currently it is not possible to re-licence a variety of vehicles through EVL (Electronic Vehicle Licencing), for example HGV's with a valid Reduced Pollution Certificate.

A relatively small number of respondents expressed a view on intermediaries although more (15%) were against an expanded role than for it (5%). Some feared that the introduction of intermediaries may result in a worse service and/or additional charges.

"Services provided by intermediaries/untrained/ unqualified staff rarely saves money."
(Response 239)

"Would be a disaster - you have to retain in-house LO staff professionalism. The mind boggles to think that local [Post Office] might be appointed to take over - God help us - might as well get on train to Swansea!" (Response 329)

"Absolutely not. Third parties only make money and serve to do so. Dedicated LOs are a service provider." (Response 143)

That said, providing the key concerns above were well managed and addressed correctly there was some support in general for the proposals if they improved services or delivered savings without any deterioration.

“Yes - in general more online service would aid our business.” (Response 149)

“Some of the changes, yes, but not all of them, no.” (Response 290)

*“It is important to cut running costs providing the same level of service is available”
(Response 30)*

9.3 Further points noted by the Review Team

These conclusions are consistent with those of the consultation team. However, for completeness we provide more detail of submissions from two national associations representing the sector.

The Freight Transport Association in principle supports the changes but with some reservations:

“Local offices play a significant part in the day to day operation of the FTA’s members business. Interaction with LO on whole good but did have faults largely due to short comings of DVLA systems which are not yet fit for purpose, cost effective service to the business sector.

FTA would only support closure of LOs if alternative facilities are introduced which catered for the number of services currently administered by these outlets. The DVLA must ensure members are not impacted by the proposals where change results in additional burden and extra cost. (Response 1005)

The Road Haulage Association broadly echoes the views of the Freight Transport Association:

“Supports the proposed changes provided the level of service currently enjoyed by its members is at least maintained, but preferably improved to the levels cost savings could be passed on to members.”

“Raises considerable concern for the membership who currently use local offices for taxing vehicles, which cannot be completed on line because of the need to view [Reduced Pollution Certificates].

Additionally Commercial vehicles MOT records may not be complete and fleet insurance documents currently also need to be seen.

To revert to centrally controlled DVLA in Swansea would also be unwelcomed” (Response 977)

10. Employees

10.1 Summary

Some 16 of respondents identified themselves as DVLA employees. In addition, the PCS submitted a comprehensive and detailed response. In our view the consultation team has summarised accurately the views of the individual employees. However, the PCS response is analysed along with other 'interest groups' and its views need to be considered in their own right.

10.2 Our analysis of the evidence

Individual employees were concerned not simply about their own position but were also worried about the impact of any office rationalisation on DVLA customers. Some two thirds of employee responses expressed an understandable concern over job losses. However, a similar proportion expressed a view that centralising the operation would overburden Swansea and lead to a deterioration in service quality.

"We are told that of the 400 new staff at Swansea, 300 will be required for enforcement role, leaving a woefully inadequate 100 to take on all the other work currently done by local offices." (Response 926)

Some employee respondents highlighted the risks of a rapid transition and the possible knock-on effect this would have on the service levels, in particular turnaround times for processing, accuracy and postal delays.

"Calls to the call centre would increase significantly as would the number of complaints. None of the above has touched on the need for postal applications and imports in particular to be processed at Swansea and it is easy to imagine the backlogs that would build up." & "This proposal is trying to implement a 5-10 year plan in 18 months and should be reviewed and revised if customer service from the DVLA is to remain at a satisfactory level." (Response 926)

Two fifths of respondents were concerned with the security and quality of services provided via any intermediary. The removal of the network, it was thought, could result in a rise of fraudulent applications and non-compliance with the law, e.g. driving without a tax disc.

An example of this is a concern with the handling of complex casework, which some respondents considered would be best processed face to face by a knowledgeable member of staff.

"Were the local offices to close, the intermediaries would be swamped with people demanding answers to their problems, which inexperienced staff without access to DVLA records would be unable to provide." (Response 926)

Some employee respondents felt that there would be problems trying to encourage an increase in electronic processing as many people have issues with internet access/literacy/language etc.

"this is clearly not what our customers are telling us. They very much want to keep the face to face. They do not want to be calling a call centre. We have many customers who cannot fill forms in, people who cannot read or write, cannot understand English, these people will struggle to fill out a consultation. These people are not reflected in any figures or facts." (Response 880)

Members of staff do however recognise the need to change current practices and identify new ways of working, ensuring that things can be done better. This can be evidenced by the various staff suggestions regarding changes to EVL which have been generated as a result of the consultation process:

“However if we have to go down the electronic services line, then any changes to the V5 registration document and driving licence i.e. change of address could be done online and must be mandatory because without the these changes being notified by them the systems will collapse.” (Response 487)

10.3 Further points noted by the Review Team

Overall, our findings are similar to those of the consultation team in respect of individual employees. However, we recommend that the management consider fully the detailed response of the PCS. It is not within our remit to comment on PCS’s complaints about the process of consultation and its view that decisions have already been taken. However, we do note that the consultation has elicited a wide range of views and concerns which should provide management with a good understanding of the challenges and opportunities that it faces if it decides to press ahead with its proposed direction of travel. In addition, the PCS submission provides:

- 1) A critique of the preliminary business case prepared by DVLA arguing that the cost benefit case has not been made, and that other options (including greater investment in the network) should be considered.
- 2) A detailed analysis of the work currently carried out, the challenges faced in providing these services if local offices closed, including alternative proposals
- 3) Summarises the concerns of motor dealers, based on a survey of dealerships which it carried out (we referred to this in section 5).

We have drawn upon 2 and 3 (along with other sources) in the final chapter of this report which provides a checklist of issues for management to consider before making any final decisions.

11. Emergency Services and other Civil Service Bodies

11.1 Summary

This group of respondents contained a number of police organisations. Their views are distinctive because their over-riding interest is not as conventional customers of DVLA. Their main concern is whether any changes to the current arrangements would result in a dilution of the DVLA's ability, along with partner agencies, to tackle law breaking.

The consultation team correctly identified this as a key concern, which we describe further here given the importance of understanding the issues raised by this community (some expressing their views with considerable strength of feeling). However, the consultation team included in this category of respondents some bodies whose views arguably should not have been assessed alongside the police (e.g. MoD, the Justices Clerks Association and Royal Mail). Moreover, the Association of Chief Police Officers (England and Wales) was analysed under the 'interest groups' category (see section 6) and so did not figure at all. In doing this, the consultation team may have inadvertently got the balance slightly wrong, even if they did not entirely miss the point.

11.2 Our analysis of the evidence

The 15 respondents placed in this category split evenly for and against the DVLA's proposed direction of travel. However, five out of eight police organisations (including ACPO) were opposed to the change, with two ambivalent (and one – a response submitted by the force's fleet department - in favour).

The main concerns around the proposals centred on an increased risk of vehicle crime especially relating to bogus imports and fraudulent Cherished Transfer applications. It was argued by some respondents that this risk would increase with the loss of expert staff in the local offices and the close working relationships that they shared with local enforcement agencies.

"[Local Offices] perform a fantastic service and prevent much vehicle crime". "Vehicle crime/fraud would increase and V5c issuing could not be controlled effectively." (Response 28),

"We in Cambs VEU have a fantastic working relationship with our VRO [Local Office]. That relationship and good communication has brought countless fraudulent applications to an abrupt end." (Response 227)

"If the enforcement officers are centralised then will there still be the ability for enforcement officers to assist with pro-active policing, for example during operations and police operated road checks?" (Response 983)

Issues were also expressed relating to specialist services, confidentiality and covert fleets with associated payments.

"Own registration of new vehicles plus other specialist services would be adversely affected by the closure". (Response 29)

There was some support for more use of electronic channels, as recognised by the consultation team. However, even so there was some were doubts about whether security and integrity could be fully met.

“What checks would be in place to ensure the authorised keeper is the one making the changes? Although online or telephone services can make a system more efficient it would have to be secure.” (Response 983)

“The move to electronic data management instead of mainly paper is long overdue. Hopefully it will enable vehicle records to be held electronically and therefore allow quick access to vehicle file histories? The loss of VROs [Local Offices] is of great concern”. (Response 622)

However, whilst some respondents were happy having straight forward transactions on-line it was also pointed out that often electronic services don't provide sufficient facilities when something goes wrong or “is different and you need to raise a non-standard question/situation”. (Response 25).

“Electronic services cannot be used for all services. Personal contact is a very important, undervalued service that seems to be dying out in favour of anonymous electronic services that inevitably cause resentment and unhappy customers.” (Response 205)

The consultation team noted three respondents welcoming additional services being provided by intermediaries. However, an equal number shared reservations doubting whether intermediaries would be able to give the same level of service and expertise that is currently received from Local Office staff. One respondent highlighted the difficulty with ensuring that a third party could guarantee sufficient security over confidential information.

“No [to Intermediaries] due to confidentiality an outside business may be couldn't guarantee this”. (Response 29),

It is also relevant to note that one respondent was worried about whether a centralised support would mean a reduction in service:

“[We} will lose valuable contacts and the ability to gain access to information that I need there and then. I have tried to contact DVLA Swansea on several occasions when Lincoln DVLA officers have not been available for whatever reason and have lost valuable enquiries time. There will be no personal assistance to me or my colleagues when and if the ‘services’ centralise to Swansea. I think that the value of the Local Offices is under estimated”. (Response 205)

11.3 Further points noted by the Review Team

The consultation team did conclude reasonably from the evidence that law enforcement agencies had particular concerns about the potential impact of proposals on fraud. We have above provided additional examples of the types of points made, given the importance of ensuring that DVLA retains the confidence of this group of partner agencies. It is worth noting that within the consultation there was a difference of emphasis between the Association of Chief Police Officers in England and Wales (ACPO) and its sister body in Scotland (ACPOS).

ACPOS stated that it was hard to come to a definitive view without more detail being provided on key elements of the proposals (how will intermediaries work). However,

“from a policing viewpoint, we cannot foresee any major issues with the centralisation of DVLA functions”.

That said they wanted to ensure that the continued close working relationship with the enforcement officers is retained. They also express concerns that if change of keeper transactions are placed on-line (or via telephone) the evidential audit trail may be weakened when it comes to prosecute a crime in court.

ACPO were unambiguously opposed to the proposals.

“Several police forces report excellent working relationships with Local Offices and are extremely concerned that centralisation of this resource will destroy these proven partnerships which have brought countless fraudulent applications to a swift end. The police service is not confident that any future relationship with a central office will be as effective.”

“In recent years the capability of VRO inspectors has been curtailed significantly, with less power to inspect vehicles and a reliance on keepers being invited to attend Local Offices for inspection. A number of specific examples are available on request where this policy has undermined detection of stolen vehicles and enforcement against individuals who refuse or are unable to bring their vehicles in for inspection.”, “The recovery rate for stolen vehicles has been dropping each year since the mid 1990’s and it is of concern that further erosion of capability will further diminish our combined ability to detect stolen vehicles and identify those responsible.”

“The lack of a formal gateway or protocol to share information and intelligence promptly does not lend itself to effective detection of criminal activity or development of suitable counter measures.”

For completeness (though somewhat differently) we would mention that;

The Justices Clerks Association feels “it is important to ensure that the DVLA database is able to fully interact with other government agency databases e.g. HMCTS Libra to ensure the accuracy and reliability of information stored. It is important that service channels are built around customer needs i.e. speed, accuracy and convenience.”

The Ministry of Defence was against any proposal to close the local office because they were concerned about service personnel based in Germany. This is because a large number of service personnel bring their vehicles back to the UK to part exchange them for a new vehicle and then return to Germany, usually within strict time limits and there are concerns regarding the impact on how this will be implemented under the current proposals.

12. Challenges

12.1 Key issues for DVLA

The following is a summary of a series of concerns mentioned by consultees and the Review Team. It raises concerns about how DVLA will deliver services if the Local Office network, and regional enforcement presence, was centralised. If alternative delivery channels are not implemented then the proposed changes to the network may lead to adverse impacts (e.g. in terms of service quality, detection of fraud or VED collection). Clearly, DVLA management may have already done a good deal of thinking in these areas. We are aware that further work is under way on an equality and impact assessment.

However, for completeness we list these issues out as a framework for management to check that it has done all the requisite thinking.

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>How will DVLA manage to provide transactions where a vehicle inspection is required?</p> <p>Ref response 142 <i>"We often need to have vehicles inspected - how would this be done with the closure of regional offices?"</i></p>	<p>Registrations, when doubts over identity of a vehicle (e.g. rebuilds)</p> <p>Some import and export applications</p> <p>Some cherished transfers (e.g. if doubts that donor vehicle exists & is entitled to the mark being transferred)</p> <p>Vehicle ownership dispute</p> <p>MoT mismatch</p>	<p>Service timeliness</p> <p>Revenue loss</p> <p>Vehicle crime</p>	<p>If inspections are to be done by an intermediary, how will DVLA train them up and QA the work?</p> <p>What does this mean for the travel time and cost for the customers?</p> <p>Will there be an increase in non-attendance?</p> <p>How will the police be reassured that the potential for fraud is not increased?</p>
<p>How will DVLA provide a premises inspection if needed, or interviews?</p> <p>Ref response 892 <i>"The AFRL system itself relies on the local office for holding records, issuing licences securely and auditing dealerships."</i></p>	<p>Trade plates</p> <p>AFRL audits</p>	<p>Motor trade competitiveness</p>	<p>If intermediaries were to be used, who will they be and how will DVLA QA their work?</p>

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>If LOs no longer supply AFRL dealers with batches of tax discs, will DVLA supply them directly to the customer in the post? Or will they be couriered directly from Swansea? Or are we going to let trusted intermediaries manage the stocks?</p> <p>Ref response 17 <i>“How will we be issued with our AFRL discs every month or will there be no more monthly collections will motor dealers have more powers.”</i></p>	<p>Registration and tax of vehicles sold by larger dealerships</p>	<p>Service timeliness Motor trade competitiveness</p>	<p>Depending on the solution, what are the implications for customers if there is a gap in receiving a tax disc after purchase?</p> <p>What happens if we do not get legislation to extend the ‘grace period’ for non-display of a tax disc?</p>
<p>How exactly will DVLA replace over the counter service in the LO for V55/1, V55/2, V55/4 and V55/5 applications. Will this be solely with a postal application route, or will it involve an intermediary?</p> <p>Ref response 657 <i>“We are one of the largest importers of Japanese vehicles and registering our vehicles is a lengthy process and being able to take the paperwork direct to our local office speeds the process up considerably.”</i></p>	<p>V55 first registrations Additional weeks tax at first registration</p>	<p>Service timeliness Motor trade competitiveness</p>	<p>Depending on the solution, what is the implication for customers if there is a delay?</p> <p>What happens if we do not get legislation to extend the ‘grace period’ for non-display of a tax disc?</p>

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>How will DVLA provide a rapid service for those who need to register their car at short notice or obtain temporary documents?</p> <p>Ref response 561 <i>“Can BFG personnel who are currently resident in Germany register their vehicle with the DVLA on-line”& “ Will the individual be allowed to drive the vehicle straight away after completing the on-line registration or will they have to wait until they receive the hard copy of the road tax disc.”</i></p>	<p>Some imports (e.g. British Forces in Germany returning to the UK to sell their vehicle before deployment elsewhere)</p> <p>V20 disc replacement applications (lost, stolen or destroyed)</p> <p>Relicensing (e.g. HGVs needing to be relicensed shortly before a planned trip abroad or advanced taxation if a vehicle is out of the country for a longer period.</p> <p>Temporary registration certificate (V379)</p> <p>Certificate of entitlement to drive (D441/D737) - if licence is lost</p>	<p>Service timeliness</p> <p>Freight industry competitiveness</p> <p>Delays for customers travelling abroad</p> <p>Enforcement action for failure to display a valid excise licence</p>	<p>Will intermediaries perform this function, or will there simply be a postal service?</p> <p>If the latter, do we need a premium postal service?</p> <p>Will V20 applications be linked to the EVL system?</p>
<p>How will DVLA deal with more complex transactions (including ones which need documents to be scrutinised or requiring substantial interaction with the customer to clarify the position?)</p> <p>Ref Response 803 <i>“There will be no single point at which several complex issues can be dealt with easily and swiftly. I fear that vulnerable groups will be most affected and indeed wonder if closure of local offices will simply lead to great distress for those already uncertain when it comes to electronic media and form filling in general.”</i></p>	<p>Complex transactions, e.g.</p> <p>Complicated Cherished Transfers</p> <p>Relicensing agricultural vehicles</p> <p>Registration of prototypes</p> <p>Vehicles with Reduced Pollution Certificates</p> <p>Changes of tax class</p> <p>Limited use</p> <p>Mobility scooters</p> <p>Late conversions</p> <p>Kits and rebuilds</p> <p>Radically altered vehicles</p> <p>Ex MoD vehicles</p>	<p>Service quality</p> <p>Service timeliness</p> <p>Accuracy of record</p> <p>Vehicle crime</p> <p>Revenue loss</p>	<p>How will the degree of expertise required for these transactions be provided?</p> <p>Where will these transactions be processed?</p>

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>How will DVLA satisfy customers who need to make payments where an individual is only able to pay in cash?</p> <p>Ref response 948 <i>"I won't be able to purchase my customers disc straight away and pay for it with cash if there is no local offices to buy this disc from."</i></p>	<p>E.g. taxing a vehicle or payment of an enforcement penalty</p>	<p>Service quality Additional charges to customer e.g. Postal Orders</p>	<p>Could this lead to social exclusion? What is in place in the event that cheques are removed from circulation?</p>
<p>How will DVLA deal with bulk applications currently completed by the LO?</p> <p>Ref response 617 <i>"We need to be able to do bulk purchases, bulk soring"</i></p>	<p>V11 and V85/1 (relicensing)</p>	<p>Service timeliness Postal issues Increased costs</p>	<p>Will there be a dedicated team to deal with bulk applications? Will intermediaries be considered for bulk processing?</p>
<p>If the LO is no longer an option, how will customers re-tax their HGVs?</p> <p>Ref response 35 <i>"[We]Have [a] number of HGV's without barcodes on renewal forms and therefore have to go to LO for taxing. How do we tax HGV's even when the Post Office won't without [a] barcode?"</i></p>	<p>V85 and V85/1 (HGV relicensing)</p>	<p>Service timeliness Postal issues</p>	<p>Will all HGV transactions be available on-line? Will intermediaries be trained to deal with these applications as the Post Office is currently unable to offer all HGV licensing? If this service is centralised, will the applicants be expected to post all their documents to Swansea and have to wait for their return?</p>
<p>How will DVLA ensure no deterioration in its ability to identify fraudulent applications?</p> <p>Ref response 924 <i>"Where will DVLA Swansea staff get all of their Local Office intelligence from, more & more dodgy applications will be able to slip through the net. More vehicles without correct keepership will be on the road"</i></p>	<p>Imports Exports First registrations Cherished Transfers Licensing</p>	<p>Vehicle crime Accuracy of record</p>	<p>Will extra steps be taken to help Swansea staff identify fraudulent documentation at source? How will a vehicles identity be established once incorrect documents have been submitted? Who will carry out inspections?</p>

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>How will DVLA manage the additional post opening resulting from centralisation?</p> <p><i>Source – Review Team</i></p>	<p>Any application posted to Swansea</p>	<p>Loss of documents</p> <p>Service timeliness</p>	<p>How will the post opener identify which documents cannot be separated? (e.g. if a CT is received together with a V5C that has new keeper details, will all the documents be kept together, as would need to be the case for processing)</p> <p>How long will documents take to be linked to its casework?</p>
<p>How will DVLA replace the facility Wimbledon LO provides to the diplomatic and consular service where the staff are highly vetted?</p> <p><i>Source – Review Team</i></p>	<p>Registering vehicles</p> <p>Issuing diplomatic licences</p>	<p>Service timeliness</p> <p>Security</p>	<p>Will this be done via Swansea and if so what arrangements might we need to facilitate this?</p> <p>Who will be responsible for accessing and maintaining the stand alone diplomatic database?</p>
<p>How will DVLA approach the trade plate migration?</p> <p><i>Source – Review Team</i></p>	<p>New trade plate applications inc. inspection/interview</p> <p>Trade plate renewals</p> <p>Duplicate trade plate discs</p> <p>Replacement trade plates</p>	<p>Service timeliness</p> <p>Accuracy of record</p> <p>Fraudulent applications</p>	<p>Who will carry out inspections/interviews?</p> <p>Who will seize trade plates if they are not renewed or surrendered?</p> <p>How will you migrate the 39 systems into one?</p>
<p>How will the DVLA process exchange licence applications?</p> <p><i>Source – Review Team</i></p>	<p>V70 - application to exchange a vehicle tax disc (e.g. a change of tax class)</p>	<p>Service timeliness</p> <p>Enforcement action for failure to display a valid excise licence</p> <p>Freight industry competitiveness</p>	<p>If this processing is centralised, would you expect a customer to keep the vehicle off the road until the replacement is received?</p> <p>Would an intermediary be asked to perform this process?</p>
<p>How will DVLA issue interim tax discs / export certificates for vehicles purchased with the intention of export?</p> <p><i>Source – Review Team</i></p>	<p>New Means of Transport</p> <p>Direct Exports</p> <p>Personal Exports</p>	<p>Motor trade competitiveness</p>	<p>Will this function be completed via electronic, postal or intermediaries?</p>

Issue	Types of transactions affected	Potential impacts change not managed well	Considerations
<p>How will DVLA deal with different enforcement processes in Scotland if it has no physical presence there?</p> <p><i>Source – Review Team</i></p>	<p>On road enforcement</p> <p>Continuous Insurance Enforcement</p> <p>CTs</p>	<p>Revenue loss</p> <p>Delays to Cherished transfers due to outstanding enforcement action</p> <p>Relationship with the Courts/Police</p> <p>Increase in non-compliance/ evasion</p>	<p>Is it feasible to do this from Wales?</p> <p>Who will maintain contact with the regional authorities?</p> <p>How will DVLA address the fact that Scottish legislation will not be able to be governed by DVLA based outside of Scotland?</p>
<p>How will DVLA manage the casework currently dealt with by the Local Offices?</p> <p><i>Source – Review Team</i></p>	<p>Changes of vehicle use</p> <p>Kit cars/rebuilds/ radically altered vehicles/ discovered vehicles</p> <p>Ownership disputes</p> <p>Vehicle identity issues</p>	<p>Service timeliness</p> <p>Accuracy of records</p> <p>Lost documentation</p>	<p>Who will be responsible for processing this work?</p> <p>Where will the casework documentation be stored?</p>
<p>How will DVLA manage the centralisation and storage of all the filing systems currently located in the network?</p> <p><i>Source – Review Team</i></p>	<p>Filing systems for;</p> <p>Trade Plates</p> <p>AFRL</p> <p>Daily balances</p> <p>Casework</p> <p>OCS paid filing</p> <p>Successful prosecutions</p> <p>Pending court work</p> <p>RD cheques</p> <p>Closed cases</p>	<p>Lost documentation</p> <p>Loss of revenue</p> <p>Accuracy of records</p> <p>Audit traceability</p>	<p>Have DVLA considered how they will migrate the filing systems and where it will be stored?</p> <p>What measures will be taken to ensure casework will not be lost during transit to DVLA Swansea?</p> <p>How will DVLA ensure that the work will continue to be actioned in the specified timescales?</p>
<p>How will DVLA action replacement tax discs, e.g. if issued originally with incorrect details?</p> <p><i>Source – Review Team</i></p>	<p>CLO141 – authorisation for a replacement disc.</p>	<p>Service timeliness</p> <p>Accuracy of disc details</p> <p>Enforcement issues</p>	<p>Who will be responsible for issuing the replacement discs and dealing with all the associated paperwork?</p> <p>If intermediaries are being used, will they be responsible for correcting their own errors?</p>

13. Ideas and Solutions

Section 12 identified a series of challenges which DVLA must address if it proceeds with further centralisation of services. Although not specifically within our terms of reference, the review team considered a range of potential solutions to at least some of the problems identified. We emphasise that we have **not** had the opportunity to evaluate these potential changes comprehensively.

However, we set them out in the following table in case this is of assistance to DVLA management.

Vehicle Inspections:

- Import/Export
- Cherished transfers
- Ownership disputes
- MoT mismatch
- Vehicle identity verification
- Changes to vehicle (Tax class)

- VOSA are capable of undertaking all inspections including HGV's with weight changes. However there is a possibility of other intermediaries becoming involved such as large dealerships or the AA to deal with less complex inspections.
- Current MoT centres could be utilised.
- Current DVLA inspectors could liaise with VOSA/Intermediaries to train and back up as subject matter experts.
- Police Vehicle Examiners could be utilised for vehicle inspections and could be used as a deterrent for suspect applications.
- Intermediaries could be fully vetted and monitored on a regular basis to prevent potential fraud.

307 – Intermediaries – trade plates and tax class changes, also inspections of only what needs to be inspected by fully trained examiners i.e. the police and VOSA.

Trade Plates:

- First application
- Renewal of licence
- Replacements
- Changes to holder details
- Audits
- Premises Inspection/interview

- Intermediaries/ Centralisation could be set up as a replacement to the Local Office Network
- Intermediaries could be fully vetted and monitored on a regular basis to prevent fraudulent issue of Trade Plates.
- Current DVLA Trade Plate inspectors could liaise with VOSA/Intermediaries to train and back up as subject matter experts providing a facility to carry out interviews.
- Possibility for trade plate interviews to be conducted over the telephone with paperwork inspection submitted via fax/ mail.
- EVL could be utilised to process trade licenses on the basis that it reflects the current regular tax disc format to prevent and avoid confusion.
- Consider using other Government agencies to complete inspections/ interviews.

770 – Presumably a new electronic system will be set up to cover trade plate renewal.

AFRL:

- First application
- Dealer point of contact (appointments)
- Stationery (Special pens)
- AFRL stamps
- Supply & recovery of unused tax discs
- Security vetting
- Audits

- Centralisation could be set up as a replacement for first applications
- Intermediaries could be used in place as a point of contact
- Allow current dealerships/future intermediaries more responsibility to maintain and manage the AFRL system/process by liaising with a dedicated DVLA team.
- Intermediaries could be fully vetted and monitored on a regular basis to prevent fraudulent issues.
- Legislation could be amended to allow a longer grace period for non-display of a tax disc, enabling electronic tax applications or postal from centralisation.

173 – An online system to register/tax a variety of vehicles, UK and foreign, and have a stock of tax discs available, similar to AFRL. My concern would be a requirement for a financial guarantee if we had a stock of tax discs.

Registration & Licensing Process/Rapid Service:

- V55 applications
- Diplomatic/Consular
- Visiting forces
- BFG
- Export
- Personal Export/Direct n Export/New Means of Transport
- Late Conversions
- Temporary Registration Certificate
- V62 applications
- Cherished Transfers
- Licensing (HGV)

- Potential intermediaries could have the facility to process all current applications in place of the Local Offices.
- Currently Local Offices offer a same day/postal option which could be carried over to intermediaries for processes and procedures.
- V70 applications involving vehicles requiring rapid service could be processed by intermediaries offering same day over the counter service.
- Licensing could be centralised and stay within DVLA due to the security element involved with these applications, providing grace periods for tax disc delivery were extended.
- Alternatively, intermediaries could be fully vetted and monitored on a regular basis by a dedicated team.
- Currently V55 forms are carbonated due to daily submissions to SMMT and other bodies for statistics; this could be replaced via an electronic link.
- If V62 application were to be online (no current keeper on record) with a vast reduction on current turnaround times then disc could be issued via EVL.
- V20 applications could be introduced via EVL with a change to legislation involving grace period for non display of a tax disc.

*173 – Registration and taxing all new vehicles.
Intermediary – If necessary, a local post office would be okay*

814 – However the convenience of being able in an emergency to register and tax a vehicle on the same day is something very important to our business. Such occasions do arise and for this reason, we feel that a local intermediary (even if not for the bulk of the transactions) is essential.

Payment options:

- Cash
- Cheques
- Postal Orders
- Credit/Debit cards
- Pre funded accounts

- Intermediaries could offer the same service as a LO where cash is accepted.
- Pay Point
- PayPal
- Pay Zone
- Pre Paid payment cards
- Reintroduction of Motor Vehicle stamps
- Direct Debit/ Credit card monthly payment scheme
- Dealerships pre funded accounts used at Local offices can be transferred the same way to an Intermediary or available for use on-line.

Enforcement:

- Regional Offices
- Casework
- Enforcement action
- Court Work
- Prosecutions

- Intermediaries could be set up in place of Enforcement Centres around the UK
- Enforcement could be centralised including a dedicated telephone line
- Possibility of a liaison unit to remain due to Scottish legislation
- Intermediaries could be responsible for enforcing prosecutions and payment collection.

Centralisation:

- Local Office Casework
- File system storage
- Audit traceability
- Accuracy of records

- Centralisation Measures/dedicated team in place to monitor accuracy measures of associated paperwork thus ensuring the work is actioned within specified timescales
- Storage of files and microfilming to be centralised allowing audit traceability
- Secure Intermediaries could be used for collection and transit of paperwork and filing systems from Local Office to Centralisation.