

## DSA Equality Impact Assessment - Initial Screening

### Part one

The initial screening of a policy/service or function should be carried out to ascertain the impact of the function/policy or strategy on the protected characteristics groups;

Age, disability, gender, gender reassignment, race, religion or belief and sexual orientation, pregnancy and maternity.

This is based on existing knowledge, data and research and will lead to a decision about whether a full impact assessment will be necessary.

An impact assessment must be carried out before a decision is made to implement a policy/service or function.

Our service delivery equality objective for 2012-16 is “to maintain a high level of accessibility to all testing services for those groups with protected characteristics” use this as a basis for answering all questions.

Further guidance on the completion of this screening form can be found here: (hyperlink): A quick guide to Equality Impact Assessments.

There is a different template to be used in cases of staff issues this can be found here: (hyperlink)

Name of policy, service or function	RELOCATION OF LAUNCESTON
Current or Proposed	Proposed
Branch/Person completing Initial screening	Peter Francis

**Please provide a brief description of the Policy, Service or Function (and its aim) which is being assessed and who will benefit or be affected.**

The relocation of Launceston Driving Test Centre as a result of notice being served by The Dept of Works & Pensions, the Major Occupier of the building, that they will not grant a further term when the current extension to the Occupancy Agreement expires on 31 January 2013.

This has resulted in the Agency reviewing its service provision in the Launceston area taking into account;

- the continued operational suitability of the location
- the facilities it offers
- the customer base
- the proximity of suitable alternative centres bearing in mind that most practical test customers should not have to travel more than the population density based travel distance criterion applicable to the location. The criterion applicable to Launceston is 30 miles
- DSA's wish to take a more flexible customer orientated approach to delivery of the practical driving test as part of the initiative to bring practical car tests closer to candidates by delivering tests from other sites such as hotels, leisure centres or local authority buildings as well as using conventional driving test centres.

Taking the above into account the Agency has been seeking to acquire a replacement venue within Launceston.

In the absence of an alternative means of service provision being identified, the Agency would have to serve Launceston from alternative permanent facilities the nearest being at Bodmin involving a single journey of circa 22 miles which would be at odds with the objective of maintaining a high level of accessibility to all testing services and bringing practical car tests closer to candidates.

The current centre is located on the ground floor comprising office space capable of accommodating 2 staff, dedicated waiting area and separate staff & customer WCs which made provision for customers with special needs. Based on the Occupancy Agreement, the Agency has the benefit of 4 dedicated bays one of which is DDA compliant. Whilst the major occupier undertook reasonably practical alterations, there remained concerns with access from the elevated car park via steps & also into the building for candidates with special needs.

Suitable alternative premise within Launceston have been identified under licence. Terms have been agreed with the landlord, instructions issued to solicitors and a planning application submitted for use as a driving test centre.

The premises being pursued is a ground floor suite which provides generous office space for staff with kitchen, a dedicated waiting room for customers and a solitary unisex WC. In keeping with Operational protocols, access to the WC would be restricted for the sole use of staff. Candidates will have three dedicated parking spaces immediately outside the entrance to the building and the site also provides generic DDA complaint bays which are in close proximity to the entrance to the suite. The terms include the rights to park 3 vehicles for staff on site.

Whilst provision of WCs is a facility the Agency would wish to offer its customers, it is understood that there is no requirement to do so. Based on the floor plans, there appears to be scope to install a 2<sup>nd</sup> WC to provide separate facilities. However, their provision would be subject to landlord approval which is unlikely to be forthcoming as the licence term sought is only for 12 months and under the present financial climate investment in such tenancies is not permitted.

There are no other WC facilities on site that either staff or our customers could use. Consequently, customers will not be afforded access to WC facilities at this site.

Appointment notifications will advise customers that on site WCs are not available to them and inform them of the locations of the nearest public toilet.

Based on the dimensions provided the office space is 38.5m<sup>2</sup> capable of accommodating 7 based on the 11m<sup>3</sup> space standard guidance. This compares to an average resource requirement of 2 based on throughput in 2011.12 and a staff in post figure of 3 representing an improvement in the examiner office environment.

MAPINFO for the period July – Sept 2011 reflects that demand for Launceston is predominately from its immediate catchment area with very little demand being attracted from locations which have nearer centres – **APPENDIX A.**

The premises being pursued are within Launceston. Based on Transport Direct, the nearest locations are Bodmin 22.1 miles; Plymouth 26.3 miles; Barnstaple 41.9 miles & Exeter 42.4 miles. All are accessible via major A rated roads – **APPENDICES D – G.**

All practical driving test candidates irrespective of discipline are required to take their test in a suitable vehicle. They travel either in their instructors' vehicles or in their own vehicle with an accompanied driver. Public transport links are therefore not a factor.

Whilst there are two alternatives within the 30 mile population density based travel distance criterion applicable to the area, closing Launceston and serving the area from the alternative locations subject to the diversion of demand being accommodated is not advocated. Cessation of our services from an existing location is contrary to the objective of maintaining a high level of accessibility to all testing services.

**When completing the next section please consider the following questions:**

- Is there any indication or evidence that different groups have different needs, experiences, issues or priorities, or that any part of the proposed policy/service or function could discriminate, directly or indirectly?
- Is there potential for, or evidence that, this policy/service or function may adversely affect equality of opportunity for all and may harm good relations between different groups?
- Is there an opportunity to better promote equality of opportunity or better community relations by altering the policy/service or function or working with other government departments or the wider community?
- Do people have the same levels of access?

This initial screening form when completed should be placed in the national folder, Equality Impact Assessments. Staff Network Groups, Trade Union Side (TUS) and the Engagement and Equality team and any other relevant stakeholders should be invited to comment and given two weeks to do so. Please detail the comments and actions taken in Annex A – consultation record.

**For help completing this section refer to (insert Hyperlink) for a list of useful publications/organisations and internal data that can be used in conducting an assessment. This list is not exhaustive. Use DSA management information (DSAMI) where available to map across national external data.**

On the basis of the evidence available and considering the questions above, what level of impact if any is the delivery of this policy/service or function going to have on the different equality groups set out below.

Protected Characteristic	Say if impact is low, medium, high, no impact, positive or negative impact						Reason and data/research used*	
	Positive			Negative				No Impact
	L	M	H	L	M	H		
Age				✓			<p>Based on 2001 Census data for the North Cornwall Local Authority area the % of the population between the ages of 16 – 74 was 72.27% - <b>APPENDIX B.</b></p> <p>In 2011/12, 2154 customers between the ages of 16 – 72 took their practical tests at Launceston. Of that number 2110 (97.96%) were between the ages of 16-50 - <b>APPENDIX C.</b></p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons of one particular age group eligible to drive. There is no reason or evidence to suggest them being adversely affected more than other PCGs by the unavailability of customer WCs.</p>	
Disability				✓			<p>DSA does not universally capture details of candidate disability so the full impact on this PCG is not known. Candidates with disabilities who declare their condition when booking their test will be expected ensuring that they receive the correct level of service at locations where compliant access has not been reasonably practical to achieve. This practice will continue unchanged.</p> <p>Customers currently have access to DDA compliant WC facilities. The lack of access to WC facilities at the alternative being pursued will be seen as having a potentially negative impact on all customers</p>	

							<p>particularly those with special needs.</p> <p>There are DDA complaint parking bays for visitors in close proximity to the premises being pursued in Launceston.</p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of a venue being secured within Launceston will prove to be any more/less problematic for persons with special needs</p>
<b>Gender</b>			✓				<p>The unavailability of customers WCs from the alternative being pursued will be seen as having a negative impact representing a deterioration in the services provided to all customers irrespective of PCG.</p> <p>Launceston is used by both sexes. In 2011/12, 1117 male (53.8%) and 1037 female (48.14%) customers took their practical tests there <b>APPENDIX C</b>. By comparison the gender of the local community is 49.07% male and 51.48% female (2001 Census data for the North Cornwall Local Authority area) - <b>APPENDIX B</b>.</p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons of one particular gender.</p>
<b>Gender reassignment</b>						✓	<p>There are no known statistics or data available from external sources. Similarly, DSA do not capture details of this protected characteristic when booking or taking a test. As a result, no assessment of impact can be made in this case.</p> <p>There is no reason or evidence to suggest that the location of or</p>

							<p>journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons within this PCG.</p>
<b>Race</b>			✓				<p>Candidates are able to voluntarily disclose details of their ethnicity when booking a theory test. No further details are captured by DSA at any other stage of the testing process.</p> <p>Only 706 (32.77%) of customers who took their test at Launceston during 2011/12 provided information to DSA. Of that number 31.66% classified themselves as White - <b>APPENDIX C</b>.</p> <p>Ethnic minority groups in the area make up a very small proportion of DSA's customer base in the North Cornwall Local Authority Area with 99.12% classifying themselves as White in the 2001 Census - <b>APPENDIX B</b>.</p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons of differing race. There is no reason or evidence to suggest them being adversely affected more than other PCGs by the unavailability of customer WCs.</p>
<b>Religion or belief</b>			✓				<p>Although there is no statutory requirement to provide prayer or ablution facilities for staff or customers, where staffing profiles are representative of a religion or belief that results in a regular requirement to use such facilities, DSA seeks to make provision for its staff through the use of a designated room or area in the test centre, where reasonably practical.</p> <p>According to the 2001 census the percentage of Muslims within the</p>

							<p>North Cornwall Local Authority area was 0% compared to the England &amp; Wales average of 3% and is ranked 374 out of 376 other Local Authority areas - <b>APPENDIX B.</b></p> <p>Such facilities were not provided by the major occupier at the premises being vacated nor by DSA in the space it occupied. None of the DSA staff based at Launceston are from a minority ethnic group. It is not considered there is a requirement or justification for such facilities to be provided for staff at the replacement premises.</p> <p>Should such facilities be requested by staff in the future at DSA leased or owned premises, consideration will be given to requests on a local level where justified &amp; practical and the necessary permissions being granted by its landlord where appropriate.</p> <p>There are other religions and beliefs but none of which are considered to require special accommodations on test or at the test centre.</p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons of one particular religion or belief group. There is no reason or evidence to suggest them being adversely affected more than other PCGs by the unavailability of customer WCs.</p>
<b>Sexual orientation</b>						✓	<p>There are no known statistics or data available from external sources. Similarly, DSA do not capture details of this protected characteristic when booking or taking a test. As a result, no assessment of impact can be made in this case.</p> <p>However, there is no reason or</p>

									evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons within this PCG.
<b>Pregnancy and Maternity</b>				✓					<p>The unavailability of customers WCs from the alternative being pursued will be seen as having a negative impact representing a deterioration in the services provided to all customers irrespective of PCG. Pregnant candidates may be more adversely affected than other PCGs.</p> <p>Launceston is used by both sexes. In 2011/12, 1037 female (48.14%) customers took their practical tests there <b>APPENDIX C</b>. By comparison the gender of the local community is 49.07% male and 51.48% female (2001 Census data for the North Cornwall Local Authority area) - <b>APPENDIX B</b>.</p> <p>There is no reason or evidence to suggest that the location of or journey to the premises being pursued or to an alternative test centre in the absence of an alternative being secured within Launceston will prove to be any more/less problematic for persons within this PCG.</p>

**\*Please attach evidence used if appropriate.**

- Low = little affect (and broadly the same) on all protected characteristics
- Medium = moderate impact on one or more protected characteristics
- High = major/significant impact on one or more or all protected characteristics

<b>What are your arrangements for monitoring the policy and its impact on end users?</b>	No specific monitoring arrangements are to be implemented in this case although all testing facilities are reviewed on an ongoing basis by the Estates and Operational delivery teams. General feedback and customer complaints would also act as a measure of positive / negative impact on the end users – these are carefully assessed on an ongoing basis.



**If there is a negative impact, rated as medium or high, complete a Full EIA (part two of this template)**

<b>Sign off</b>		
	<b>Name/signed</b>	<b>Date</b>
<b>HOB/Operational Manager</b>	Ray Colesby, Regional Operations Manager South Wales & Southern England	20 11 12

**Once complete please forward to the Engagement and Equality Team (insert email)**

**Thank you for your cooperation.**

<b>Engagement and Equality Team Action</b>	
<b>Date received</b>	
<b>Date published</b>	

## Annex A

## Consultation Record

<b>Who was consulted or involved in the meeting/discussion (for example: Staff Networks, TUS, Engagement and Equality Team )</b>	<b>Date of consultation</b>	<b>Issue/concern raised</b>	<b>Response provided/given</b>	<b>Resultant change or action arising</b>
Staff Networks - (ADA, WAG, RACE, Equilibrium, PCS), Engagement & Equality Team, Regional Operations Manager.	02 11 2012	See stakeholder feedback record	See stakeholder feedback record	See stakeholder feedback record

## DSA – Full equality impact assessment

### Part two

The full equality impact assessment should be carried out when the initial screening indicates there to be a potential medium or high negative impact to one or more of the protected characteristics groups in relation to the proposed function/policy or strategy.

This assessment should look to fill in any gaps in data and research that you have identified. Consideration should be given to what mitigation can be carried out to minimise the adverse impact on the protected characteristic groups.

This full impact assessment should be used in conjunction with the findings from the initial screening so that rework is avoided.

#### Further assessment

**Who have you further consulted with and what further evidence do you have since the initial screening took place.**

There is no requirement for formal consultation. The Agency's Code of Practice provides for a relocation/closure to proceed without formal consultation where there is an alternative facility within the appropriate travel distance criteria irrespective of Protected Characteristic Group. The distance appropriate to Launceston is 30 miles. The alternative being pursued is within Launceston.

The Minister, MP's for the area, national instructor Associations and the Trade Union Side have been briefed on the requirement to vacate the existing premises and that an alternative is being pursued. Local driving instructors that use the centre have been advised in writing in keeping with our Code of Practice. A further announcement will be made when the replacement has been secured and the operational date determined.

The examiner staff based at Launceston have been briefed.

In completing this assessment the following data & research was considered;

- The Agency's 30 mile travel distance criterion appropriate to the population density of the area in relation to the proximity of suitable alternative centres.
- MAPINFO detailing customer base in relation to the Launceston facility & its likely dispersal to alternative facilities – **APPENDIX A.**
- The results of the 2001 census on the demographic for the local authority area of North Cornwall – **APPENDIX B.**
- Management Information on Launceston's customer breakdown by ethnicity and age & gender – **APPENDIX C.**
- Transport Direct Website's Journey Planner to the nearest alternative facilities – **APPENDICES D - G.**

**What mitigating actions or adaptations to the policy/function or service have been considered?**

The availability of alternative premises with separate WC facilities for customers has not been identified.

<p><b>What alternative measures or policies were considered and what action has been taken?</b></p> <p>None. Relocation of these services within Launceston complies with the Agency's service criteria for most practical test customers and meets the Agency's objectives to take a more flexible customer orientated approach to delivering the practical driving test and maintaining a high level of accessibility to all testing services.</p>
<p><b>Final decision – What is the final decision in light of the evidence above?</b></p> <p>The closure of the existing premises will proceed in keeping with the notice served by the major occupier.</p>
<p><b>How is policy/function or service to be implemented and by when.</b></p> <p>The policy will be effected in conjunction with the required vacation date and the operational date at the new premises will be established subject to planning being granted and successful acquisition of the alternative.</p>

<b>Sign off</b>		
	<b>Name/signed</b>	<b>Date</b>
<b>HOB/Operational Manager</b>	Ray Colesby, Regional Operations Manager South Wales & Southern England	20 11 12

Once complete please forward to Engagement and Equality Team (insert email)

Thank you for your cooperation.

<b>Engagement and Equality Action</b>	
<b>Date received</b>	
<b>Date published</b>	

## Action Plan and Timetable for Implementation

At this stage a timetabled action plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function.

Recommendation	Actions Proposed	Outcome	Milestone and date	Person Responsible