

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 policy/service or function 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 equality impact assessment will be necessary.

An equality 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	ADI Qualification
Current or Proposed	Proposed
Branch/Person completing Initial screening	Ian Holden, Lynn Fitzharris, Laura Scanlon, Huw Davies,
Please provide a brief description of the <ul style="list-style-type: none"> • Policy, Service or Function which is being assessed • its aim; and who will benefit or be affected.	
<p>The Modernising Driver Training (MDT) project is proposing that DSA should change the way in which Approved Driving Instructors (ADIs) are trained and assessed.</p> <p><u>Current Qualification Process</u></p> <p>At the moment, those who wish to become ADIs apply to the DSA to get CRB and ‘fit and proper’ clearance. They must then pass three tests, in order:</p> <ul style="list-style-type: none"> • Part 1 – A computer-based examination of driving and instructional theory and a hazard-perception test; • Part 2 – A practical driving ability test; • Part 3 – A practical instructional ability test. <p>Part 1 is overseen by Pearson staff. Parts 2 and 3 are run by DSA examiner staff.</p>	

Those who pass the Part 2 test and have forty hours of training from an instructor-trainer are entitled to DSA for a Trainee Licence. This allows them to prepare for the Part 3 test by getting practical experience of delivering paid instruction for up to six months. They can then apply for a second Trainee Licence when the first one runs out.

Once they have passed the Part 3 test they can apply to DSA to be entered on the Register of ADIs.

After discussion with the ADI industry the DSA wants to improve the process because of;

- abuses of the trainee licence scheme and road safety concerns. Learners may receive unsupervised instruction from a person who is not qualified.
- the need to bring it into line with the DSA's National Driver / Rider Training Standard (NDRTS).
- low completion rates, less than 50% of people who start the ADI process actually qualify (see Annex B).

Proposed Qualification Process

Under the MDT proposals those wishing to become ADIs apply to take a vocational qualification at a training centre which has been approved by an awarding organisation. The awarding organisation places conditions on training centres to ensure that the qualification process is operated in a way which complies fully with all relevant equalities legislation..

The ADI qualification would be based on the Driver Training National Occupational Standards (NOS), which are based on the NDRTS. By basing the qualification on clearly stated learning outcomes, with clear definitions of the required evidence of competence, we reduce the chance of discrimination. When someone has successfully completed the qualification they can apply to the Registrar to be entered on the DSA ADI Register.

Approved training centres are required to counsel all applicants to ensure that the qualification they wish to take is appropriate for them. For the ADI qualification they will inform the trainee upfront that, as well as passing the qualification, they will need to pass a Criminal Records Check (CRC clearance, motoring convictions etc) before the Registrar will admit them to the register.

A trainee licence is not available under the vocational qualification. Where an ADI trainer considers that it is appropriate for a trainee instructor to deliver a lesson to a 'real' learner, for payment, they will be covered by a general exemption. That exemption will require the ADI trainer to be present in the vehicle during the lesson. They will also have to ensure that the learner is aware of the trainee's status.

The key parties affected by these proposals are:

- trainee driving instructors ~ who are more likely to achieve qualification and, on average, are likely to spend less money doing so (completion rates of 60-75% are set out in the economic impact assessment compared to current rates of less than 50%)
- driving instructor trainers ~ who must now operate within the requirements of an awarding organisation
- those who currently employ trainee driving instructors to deliver driver training ~ who will no longer be able to employ trainee instructors as there will not be a trainee licence scheme. They will have to employ instructors once they have become ADIs.

Those indirectly affected include:

- learner drivers ~ who will be clear about the status of the person giving them instruction
- examiners involved in the DSA test route for trainee driving instructors ~ who will no longer be required to carry out ADI qualification testing, which they do in addition to learner driver testing

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	✓							Vocational Qualification The vocational qualification will be based on clearly stated learning outcomes, with clear definitions of the required evidence of competence. The chance of people being penalised on the basis of factors other than their ability is reduced. Therefore, the vocational qualification should have a positive impact on both training and assessment within the qualification process. No such conditions are currently placed on instructor trainers by DSA. Trainee Licence Annex C shows, for the 12 months to November 2012, the age distribution of all trainee driving instructors passing the Part 2 of the current ADI qualification process, compared to the age distribution of trainee driving instructors who applied for a trainee licence. This shows a similar distribution across most ages except for the upper and lower age bands. DSA cannot identify any reasons at this stage why this might be the case.	
Disability	✓							Nothing in this process changes the limits that disability imposes on a particular individual's ability to give driving instruction. The move to competence based assessment is about demonstrating	

							competence, i.e. can the learner do what the standard requires them to do. Vocational learning simply means learning what is required to pursue a vocation. It is largely, though not exclusively, based on practice in the workplace. Within a client centred environment we accept that people learn in different ways. What we look for is evidence that, in whatever way suits them, they can demonstrate that competence. So, typically, assessment would consist of a number of observed practice sessions. Those would be backed up by professional discussion, i.e. sessions in which the learner is given the opportunity to explain why they did or did not do particular things and to consider how they might respond in other situations i.e. those which are difficult to simulate such as high risk environments. That in turn could be supported by a reflective log completed by the learner. It could, if appropriate, be supported by tests of objective knowledge but the important thing to remember is that the learner plays an active role in putting together their portfolio of evidence of competence. They are not required to demonstrate competence through a single, common, instrument of assessment. So, for example, a person who finds it particularly difficult to write what they are thinking could use recordings. The assessor can make these adjustments so long as there is a package of mutually supporting evidence that the learning outcomes have been achieved. The overall outcome of this approach should be that everybody should, working with their assessor, be able to put together a package which suits their particular needs.
Gender				✓			Annex D shows the percentage of each gender applying for a trainee licence. It shows a moderately higher percentage of females apply for the trainee licence. DSA does not have any evidence as to why this might be. It could be argued that females are more likely to take out a trainee licence because they believe it will enable them to earn while training on an extended basis due to child/other care arrangements. A low impact may result from the proposals for this protected characteristic. See vocational qualification comments within age characteristic.
Gender reassignment	✓						DSA does not have access to data on this protected characteristic and cannot identify any reason why it might negatively influence a trainee driving instructor's decision to apply for a trainee licence. See vocational qualification comments within age characteristic.
Race	✓						Annex E shows, for the 12 months to November 2012, the ethnic origins of all trainee driving instructors passing the Part 2 test, compared to the ethnic origins of those who apply for a trainee

								<p>licence.</p> <p>Where ethnic origin is given the percentage applying for a trainee licence is, in the main, less than or equal to the percentage passing the part 2. This is with the exception of a small number of Black-Africans (2.3% vs 1.9%) and Bangladeshis (2.9% vs 2.5%). This indicates there is a low potential impact on these two ethnic origin groups.</p> <p>Where ethnic origin is not provided 18.8% pass the part 2 but 25.5% apply for a trainee licence. Therefore we cannot analyse the impact on 6.7% of those who apply for a trainee licence. No further conclusions can be drawn.</p> <p>See vocational qualification comments within age characteristic.</p>
Religion or belief	✓							<p>DSA does not have access to data on this protected characteristic and cannot identify any reason why it might negatively influence a trainee driving instructor's decision to apply for a trainee licence.</p> <p>See vocational qualification comments within age characteristic.</p>
Sexual orientation	✓							<p>DSA does not have access to data on this protected characteristic and cannot identify any reason why it might negatively influence a trainee driving instructor's decision to apply for a trainee licence.</p> <p>See vocational qualification comments within age characteristic.</p>
Pregnancy and Maternity	✓							<p>DSA does not have access to data on this protected characteristic and cannot identify any reason why it might negatively influence a trainee driving instructor's decision to apply for a trainee licence.</p> <p>See vocational qualification comments within age characteristic.</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

What are your arrangements for monitoring the policy and its impact on end users?

There are no plans to monitor anything new, above and beyond age, gender and ethnicity that is currently collated when a person applies to be on the ADI register. However Ofqual regulations require that equal opportunities are monitored actively and robustly within the delivery of any qualification. DSA would rely on the awarding organisation to work within those regulations.

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

Sign off		
	Name/signed	Date
HOB/Operational Manager/SRO	Mark Magee	10/01/13

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

Thank you for your cooperation.

Engagement and Equality Team Action	
Date received	
Date published	

Annex A

Consultation Record

Who was consulted or involved in the meeting/discussion (for example: Staff Networks, TUS, Engagement and Equality Team)	Date of consultation	Issue/concern raised	Response provided/given	Resultant change or action arising

Annex B

The following provides an indication of numbers involved in ADI training:

- ADIs on the Register (as at 19 December 2012)	45,613
- Applications to start the qualification process (Jan – Dec 2012)	5,576
- Joined the Register (Jan – Dec 2012)	2,236
- Trainee licences issued (Jan – Dec 2012)	2,101

Annex C

Age profile of trainee driving instructors applying for a trainee licence (Nov 2011-Nov 2012)

Age Band	Number of trainee driving instructors passing the part 2		Trainee Licences Applied For*	
	Number	%	Number	%
21-30	705	22.5%	288	14.3%
31-40	835	26.6%	523	25.9%
41-50	973	31.0%	618	30.6%
51-60	571	18.2%	456	22.6%
61-70	55	1.8%	129	6.4%
70+	1	0.0%	5	0.2%
All ages	3140	100.0%	2019	100.0%

* DSA records indicate that when a trainee driving instructor applies for a Trainee Licence they apply for 1.6 licences on average (a Trainee Licence lasts for 6 months and an additional licence can be applied for)

Note: the ratio of licences held by a group may be more than the 1.6 average and the data may include trainee driving instructors in this age band that passed the part 2 before the data period being considered but applied for a licence within the period. For example in the 70+ age group 5 trainee driving instructors applied for a trainee licence, when only 1 had passed the part 2 in the period.

Annex D

Gender split of trainee driving instructors who pass part 2 and apply for trainee licence. The 3rd and 4th columns take into account the fact that on average 1.6 licences are applied for. (A Trainee Licence lasts for 6 months and an additional licence can be applied for.) (Nov 2011-Nov 2012)

Gender	Number of trainee driving instructors passing the part 2	Trainee Licences Applied For*	The number of Trainee Licences applied divided by 1.6 to take into account *	Percentage of each gender applying for Trainee Licences
Male	2398	1477	923	38.5%
Female	740	540	338	45.6%
Combined	3138	2017	1261	n/a

* DSA records indicate that when a trainee driving instructor applies for a Trainee Licence they apply for 1.6 licences on average (a Trainee Licence lasts for 6 months and an additional licence can be applied for)

Annex E

Ethnic origins of trainee driving instructors who pass part 2 and apply for trainee licence (Nov 2011-Nov 2012).

Ethnic origin	Ethnic origins of trainee driving instructors who passed the part two test		Ethnic origins of those applying for Trainee Licences	
	Number	%	Number	%
Any White background	169	5.0%	39	2.7%
Arab	16	0.5%	8	0.5%
Bangladeshi	85	2.5%	42	2.9%
Black-African	63	1.9%	34	2.3%
Black-Caribbean	44	1.3%	22	1.5%
Black-Other	15	0.4%	9	0.6%
Chinese	13	0.4%	8	0.5%
Indian	137	4.1%	62	4.2%
Mixed Asian and White	6	0.2%	2	0.1%
Mixed Asian Background	2	0.1%	1	0.1%
Mixed Caribbean and White	5	0.1%	2	0.1%
Not provided	634	18.8%	373	25.5%
Other	77	2.3%	34	2.3%
Other Asian background	50	1.5%	11	0.8%
Other Black background	5	0.1%	0	0.0%
Other Ethnic background	4	0.1%	1	0.1%
Other Mixed Ethnic background	4	0.1%	1	0.1%
Pakistani	227	6.7%	94	6.4%
Prefer not to say	12	0.4%	3	0.2%
White	1,807	53.5%	716	49.0%
Grand Total:	3,375	100.0%	1462.00	100.0%

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 service.

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

Further assessment

What alternative measures or policies were considered and what action has been taken?

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

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

<p>Final decision – What is the final decision in light of the evidence above? (Do you need to timetable reviews or action plans to monitor impacts on Equality? See Annex B)</p>
<p>How is policy/function or service to be implemented and by when.</p>

Sign off		
	Name/signed	Date
HOB/Operational Manager/SRO		

Once complete please forward to Engagement and Equality Team on @Equality.Engagement.team

Thank you for your cooperation.

Engagement and Equality Action	
Date received	
Date published	