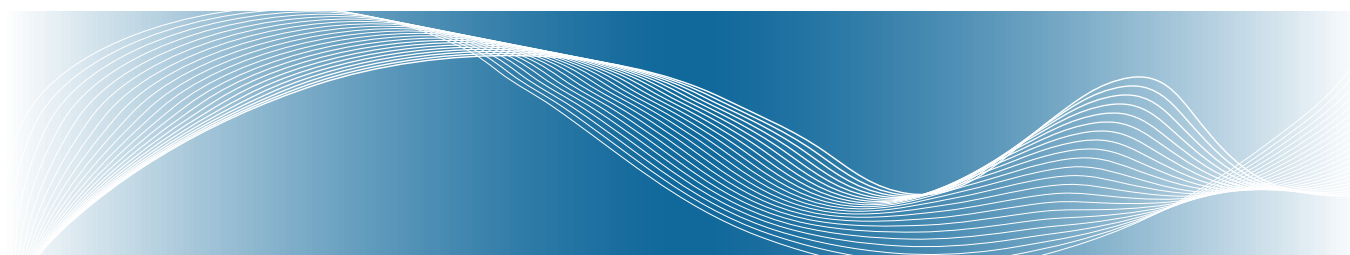




# Impact Assessment

## Annex A

## DVLA Equality Analysis: Customers



## 1. Introduction

This Equality Analysis (EA) was carried out to consider the equality impact of the proposed closure of DVLA's local office and enforcement network to help us meet the requirements of the Equality Act 2010.

This EA considers the impact of the proposed closure on the customers, of which there are approximately 2.5 million per year, who use the DVLA's 39 local offices and 10 regional enforcement centres. The impact on customers will be assessed in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

## 2. Intended Outcomes

The intended outcomes of the proposal are:

- Closure of DVLA's local office network with net cost savings to DVLA, supporting the move to greater efficiency whilst continuing to offer services in line with customer expectations.

## 3. Aims, Objectives and Purpose

- The proposal is to close the Local Office Network by December 2013. This will mean transferring customer transactions to other channels by:
  - providing further electronic channels;
  - centralising enforcement activity and some services at DVLA Swansea;
  - transferring other transactions to third party intermediaries whose service would be fully compliant with the Equality Act 2010.
- The purpose would be to make the delivery of DVLA services more efficient.

## 4. Evidence Base

### Data Sources

- A copy of the consultation can be found at <http://www.dft.gov.uk/dvla/consultations.aspx>;
- Responses to DVLA's consultation paper, "Transforming DVLA Services" (The consultation ended on 20 March 2012. Over 1000 comments were offered from different individuals, businesses and organisations);
- Post-consultation sessions with stakeholders to discuss specific equality issues;
- Customer diversity questionnaire carried out across the Local Office Network in May 2012;
- Ofcom 2011 Metrics Bulletin – Internet use and attitudes;
- Office for National Statistics (ONS) Census 2001 Data;
- ONS - Internet Access - Households and Individuals 2011;
- ONS - United Kingdom Health Statistics 2010;
- ONS - The Life Opportunities Survey 2009-2010;
- ONS - Internet Access Quarterly Update 2011 Q2;
- ONS - population-estimates for the UK, England and Wales, Scotland and Northern Ireland mid-2010;

- Literacy Trust report on literacy levels in England;
- HM Treasury report on Consumer Finance; and
- Disability Discrimination Act (DDA) Audit information.

## 5. Consultation & Involvement

The EA process was completed with support from:

- DVLA subject matter experts;
- Trade Union Side (TUS);
- staff networks;
- customers via full consultation and local office questionnaires;
- customer representative groups; and
- DVLA business contacts.

Full details can be found at Annex A: Record of Consultations/Involvement.

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

### Age

#### Data

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

Data is not generally held to identify the age of customers who use our local offices. However, an exercise was carried out at local offices across the DVLA network in May 2012 to collect data from customers<sup>4</sup>, including age. The table above from the snapshot survey suggests that the majority of local office customers are within the 26-40 age range. It also shows that 20% of local office customers were aged 61 or over.

Responses to the DVLA consultation raised concerns about the link between age and access to electronic services. There were 84 respondents who expressed the view that older people may not be computer literate so unable to take advantage of the ‘more efficient’ online services proposed. For example, a motor dealer commented that “the elderly need to be able to speak to someone in person to deal with their licensing issues.” However, the statistics from the snapshot survey do not suggest that older people rely on the local office service more than any other age group.

<sup>4</sup> DVLA local offices carried out a one-day survey across the entire Local Office Network between 15 and 25 May to help understand the equality groups represented by customers. Responses to the survey were received at DVLA Swansea from 35 of the 39 local offices.

The DVLA knows that its customers are increasingly turning to online and telephone services as their preferred contact channels. 55% of vehicle licensing transactions were carried out online over the first 3 months of 2012, 92% of first vehicle registrations are made through an automated system and around 32% of driver licensing applications are completed online. This reflects the wider trend in the UK, with more and more consumers choosing to shop online and use electronic services. According to a study by Ofcom, 80% of UK adults aged 16 and over used the internet in 2011, up 3% from 2010<sup>5</sup>. The largest proportion of UK Internet users was in the 16 to 24 age group, with 98.8% of this group having used the internet. This represented 7.19 million people<sup>6</sup>. This compares to 24% of UK adults over the age of 75 having ever used the internet. However, there is an upward trend in the number of UK adults over the age of 55 using the internet, increasing by 4% between 2010 and 2011 to 55%<sup>7</sup>.

## Impact

The DVLA recognises that some customers may experience difficulties in using electronic channels. In particular, issues may arise with some older customers, with the majority of those aged 70 and over having never used the internet<sup>8</sup>. Responses to the consultation suggested that some of these customers may rely on the local office to provide face-to-face assistance in completing forms, as well as preferring the counter service to complete a transaction. However, intermediaries offering front office counter services would continue this face-to-face service for many transactions.

The level of expertise currently offered by the local office may be reduced at an intermediary. Although customers may use the contact centre for advice and guidance, this could be considered an inferior means of communication for those customers who prefer face-to-face contact. In addition, some transactions could not be provided through an intermediary and instead, customers would be able to use the post or an online service (transactions that could be performed by an intermediary are laid out in Annex B)<sup>9</sup>. For older customers who prefer not to use the internet, the postal route may be considered less convenient than attending the local office, especially in the absence of face-to-face assistance.

The DVLA local offices currently offer a service standard of an average 15 minutes queuing time. An intermediary selected to carry out some DVLA functions will be performing a range of functions to customers, including any DVLA work that they have taken on. At this stage, 15 minutes queuing time cannot be confirmed – this would be covered through contract negotiations. Any potential increase in service time may cause difficulty for some older customers who may have mobility concerns.

Whilst the DVLA's local offices offer dedicated parking and seating for customers, which can be useful for our older customers, intermediaries may not be able to offer these facilities. However, by moving many face-to-face services from the 39 local offices to a wider range of intermediaries, direct customer service will become available throughout most towns and cities in the UK. This may make it more convenient for elderly motorists by provision of a more localised service, whilst also eliminating the disadvantage to DVLA customers who do not have a local office in their area. An increased number of intermediaries and their geographical spread may mean that fewer of our older customers are required to travel long distances to offices offering DVLA services.

<sup>5</sup> <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

<sup>6</sup> <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html#tab-Age>

<sup>7</sup> <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>

<sup>8</sup> <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html#tab-Age>

<sup>9</sup> The one exception is certificate of entitlement to drive which will be available only by telephone. The bulk of these are already handled by DVLA's call centre but 250 a year are still completed at a local office. It is not clear why this is the case and the Agency is continuing to investigate customer needs.

A wide range of stakeholders and representative groups were invited to discuss these issues in more detail, to ensure the impact on various customer groups was fully understood. Discussions were held with the National Pensioners Convention (NPC) whose primary concern was to ensure that other channels remained open, so customers weren't forced to use electronic channels. In addition, the NPC stressed that the face-to-face service should be available in at least as many locations nationally with the same geographic spread.

### How this will be addressed

1. Consideration is being given to ensuring that alternative channels maintain current service levels. This is set out in the main impact assessment.
2. The continuation of a paper channel and intermediaries to perform face-to-face transactions would mean that those who cannot, or would prefer not to use the Agency's electronic services will still have access to alternative channels.
3. Whilst the proposals may not meet the preferences of older customers in some respects, the DVLA believes that there is no unlawful discrimination against this protected characteristic.

### Disability

#### Data

Whilst no specific information is collected about the number of disabled customers who use the DVLA local offices, the following table shows the number of disabled people (including those with limiting, longstanding illness/es) as a percentage of GB population by age and gender<sup>10</sup>.

% Disabled people							
Age Group	16–24	25–34	35–44	45–54	55–64	65–74	75+
All Persons	2.5	2.6	4.2	6.4	10.4	12.0	4.3
England	2.4	2.4	3.8	5.9	9.5	10.7	3.8
Wales	2.8	3.7	5.8	9.1	15.6	19.7	7.9
Scotland	2.7	3.2	5.3	7.8	12.6	14.3	5.4
Men	2.9	2.7	4.1	6.0	9.8	12.1	4.9
England	2.8	2.5	3.7	5.5	8.9	10.8	4.3
Wales	3.4	3.9	5.7	8.3	14.8	20.4	9.7
Scotland	3.2	3.4	5.2	7.2	11.9	14.5	6.2
Women	2.0	2.5	4.3	6.9	11.0	11.9	3.9
England	1.9	2.3	3.9	6.3	10.1	10.6	3.5
Wales	2.3	3.4	5.9	9.8	16.4	19.0	6.7
Scotland	2.2	3.1	5.4	8.4	13.3	14.1	4.9

<sup>10</sup> <http://www.ons.gov.uk/ons/rel/ukhs/united-kingdom-health-statistics/2010/edition-4--2010.pdf>

Overall, 26 adults out of every 100 were identified as having a disability and are protected by the Equality Act 2010. Furthermore, 29 adults out of every 100 have impairments<sup>11</sup>. The snapshot survey undertaken in local offices suggested that around 5% of local office customers are disabled, although an additional 3% preferred not to say either way.

There were 17 responses to the consultation that raised disability concerns about the proposed closure of the local offices, stating that their disability causes them to rely on the local office service to help them transact, such as people with learning difficulties or those with hearing difficulties. Concerns were also raised by 12 respondents who mentioned disability acting as a barrier to the use of the internet. For example one private individual commented that “using a PC is harder for me than personally visiting due to visual problems” and a further respondent explained “I am dyslexic and require face-to-face consultancy.”

Several customers also raised concerns about the reliance on telephone systems due to hearing difficulties.

By the second quarter of 2011, 37% of disabled adults (4.24 million) had never used the internet, representing almost half of all UK adults who had never used it. By comparison, of those adults who reported no disability, 11.6% had never used the internet<sup>12</sup>. Research by Ofcom suggests that only 56% of disabled adults have internet access in their homes, compared with the UK average of 76%<sup>13</sup>.

## **Impact**

The data suggests that some disabled adults will not be able to take advantage of online services as they prefer, or need, face-to-face channels. Intermediaries will be able to offer this service for many transactions. For services not going to an intermediary or being delivered through electronic channels, these customers will be able to use a postal channel.

For example, tax class changes involving a change of keeper won't be available at an intermediary if the proposals go ahead and instead would be processed centrally. This accounts for around 2.5% of tax class changes and would have impacted around 750 disabled customers in 2011 who changed from one of these tax classes into the disabled tax class. These customers would have to complete the transaction by post.

It is worth noting that if an application for vehicle tax is made by post at the end of the month, there's now an exemption for not displaying a tax disc. This exemption covers the first five working days of the month to allow time for the new disc to arrive in the post. The exemption only applies if applications are made before the current tax disc or SORN expires. It is expected that this exemption will be increased to 14 days for a range of licensing transactions.

Disabled customers who currently use the local office for advice and guidance will be able to ring the contact centre. However, this may not meet the needs of some customers who rely on face-to-face contact, such as customers who are hard of hearing, although facilities are available to help those with hearing needs.

<sup>11</sup> <http://www.ons.gov.uk/ons/rel/los/life-opportunities-survey/life-opportunities-survey/rep---life-opportunities-survey--easy-read-executive-summary--2009-10.pdf>

<sup>12</sup> <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html>

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

The DVLA is looking to reduce the number of supporting documents that customers need to send with their applications. This will reduce the potential for these documents to become lost in the post, so improving the service offered through postal channels for those who cannot, or prefer not to use electronic channels. Furthermore, the DVLA would streamline its centralised processes to improve turnaround times for customers, so the postal route may not necessarily offer an inferior service.

Most local offices offer car parking facilities which is important for those with mobility impairment. Any intermediary that is chosen to perform front office counter services may not be able to offer this dedicated car parking, causing difficulties for some customers with a disability. However, the range of potential outlets available might outweigh this factor.

The DVLA local offices currently offer a service standard of an average 15 minutes queuing time. An intermediary selected to carry out some DVLA functions will be performing a range of functions to customers, including any DVLA work that they have taken on. At this stage, 15 minutes queuing time cannot be confirmed as this would be covered through contract negotiations. Any potential increase in service time could impact some disabled customers who are unable to stand for long periods of time, especially as seats may not be provided by an intermediary, as currently offered at a local office.

Furthermore, DVLA's local offices currently offer private meeting rooms which are used when dealing with sensitive discussions. Provision of similar private rooms is unlikely to be available through intermediaries (Annex C) so customers will have to contact DVLA in writing or by telephone to discuss more complex issues or personal information relating to a physical or mental health condition. However, these transactions are not the norm in local offices now so any impact is expected to be minimal.

By moving face-to-face services from the 39 local offices to a wider range of intermediaries, access to a face-to-face service will become available throughout most towns and cities in the UK. This may make it more convenient for disabled motorists and would remove the disadvantage to DVLA customers who do not have a local office in their area. In addition, the greater number of intermediaries and their wider geographical spread may mean that fewer disabled customers are required to travel long distances to DVLA local offices. More flexible opening patterns of intermediaries may also improve the accessibility of a face-to-face service for disabled motorists. Increasing the number of services provided by DVLA online may also offer greater ease of access to customers. Customers will be able to apply by post or through intermediaries if they cannot or do not access the internet.

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

## How this will be addressed

1. The continuation of a paper channel and intermediaries to perform face-to-face transactions would mean that those who cannot, or prefer not to use the Agency's electronic services will have alternative channels available to them.
2. The DVLA will ensure electronic systems are compliant with 'AA' classification<sup>14</sup>.
3. The DVLA will ensure that any intermediary chosen to perform some local office functions will be fully compliant with the Equality Act.
4. Whilst the proposals may not meet the preferences of disabled customers in some respects, the DVLA believes that there is no unlawful discrimination against this protected characteristic.

## Gender reassignment

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

## Race

### Data

Ethnic Data Considered		
	White %	Black minority ethnic %
UK <sup>15</sup>	85.67	14.33
Sample of DVLA local office visitors, May 2012	84% (NB the responses were not mutually exclusive)	16% (NB the responses were not mutually exclusive)

An exercise was carried out at local offices across the DVLA network in May 2012 to collect customers data, including ethnicity. The table above outlines the use of the local office services by customers from different ethnic groups in comparison with the UK population. This suggests that the ethnicity of local office customers is in proportion to the UK as a whole.

A study by Ofcom suggested that 78% of UK adults from an ethnic minority group have internet access in their homes, compared to a UK average of 76%<sup>16</sup>. Therefore, the DVLA does not anticipate there to be a disproportionate issue with access to electronic services for this protected characteristic.

The DVLA has analysed the feedback from the consultation and the only ethnicity issue that was identified relates to language concerns. There were 38 respondents who raised language barriers as an issue if the local offices were to close, as non-English speakers may struggle to communicate on the telephone, or fill in forms without face-to-face assistance.

The DVLA does not formally collect specific data on local office customers who cannot speak or read English. However, a brief informal exercise identified what languages are most commonly spoken by local office customers and how local office staff can help those for whom English is not their first language.

<sup>14</sup> <http://www.dda-audit.co.uk/audit/wai-aa.htm>

<sup>15</sup> Office for National Statistics Census 2001

<sup>16</sup> <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>



This is laid out in the table below, which highlights a wide-ranging language demand at DVLA local offices based in large metropolitan areas. The provision of non-English language service varies across DVLA's network of local offices because recruitment at local offices is generally drawn from the local population.

### Analysis of Demand and Supply of Local Office Services in Non-English Languages

	Frequently Preferred Language	Languages Available in Office
Aberdeen	Polish and Lithuanian.	English
Bangor	Welsh	English and Welsh
Beverley	Several languages from Iraq and Iran. Customers generally attend with community support.	English & British Sign language
Birmingham	Some customers struggle with English at this local office but tend to bring someone with them to help translate.	English, Punjabi, Urdu and Mirpuri
Borehamwood	Polish, Romanian, Bulgarian, Arabic and Hungarian	English, Punjabi, Hindi, Gujarati, French
Bournemouth	English	English
Brighton	Hungarian, Polish, and Pakistani – Customers generally attend the local office with friends and family.	English
Bristol	Polish, Romanian and Hungarian	English, Gujarati & Hindi
Cardiff	Welsh, Polish and Ukrainian	English
Carlisle	Polish is often a preferred language but people who use this office can generally speak enough English to get the service they want.	English & British Sign language
Chelmsford	Polish, Lithuanian and Latvian	English
Chester	Russian and Polish	English
Dundee	Punjabi and Polish, often accompanied by an interpreter.	English
Edinburgh	English, Polish, Scottish Gaelic, Bangladeshi, Urdu, Hindi, Gujarati, Arabic, Mandarin, Cantonese, Lithuanian, Estonian, Latvian, Romanian, Russian and Slovak	English
Exeter	Polish and Mandarin	English, French
Glasgow	Polish, Romanian and Indian. Customers sometimes accompanied by staff from Citizen's Advice Bureau.	English, Cantonese
Inverness	Polish	English
Ipswich	Polish, Lithuanian, Portuguese, Spanish, Latvian and Japanese	English
Leeds	Hindi, Urdu, Punjabi, Bengali, Gujarati and Polish	English, Hindi, Urdu, Punjabi, Bengali, Gujarati
Lincoln	Polish, Romanian and Lithuanian	Punjabi and Hindi

Maidstone	Several languages from Iran and Afghanistan. Polish. Customers normally bring family or friends to help	English
Manchester	Punjabi, Hindi, Urdu, Gujarati, Polish, Romanian, Lithuanian, Czech, Bulgarian, Spanish, French, German, Mandarin plus a wide variety of African Languages. Estimated 1% provided solely in preferred language. 5%-10% in English with the help of visual aids in order to communicate.	English, Punjabi, Urdu, Gujarati, Hindi, Polish, Spanish, French and Nigerian
Newcastle	English. Polish. Several languages from Iraq and Iran. Customers generally bring someone who can help translate.	English, Cantonese
Northampton	Polish, Romania, Hindu and Turkish	English, Hindu
Norwich	Polish, Latvian, Lithuanian, Portuguese and Chinese. Customers can generally speak enough English to get the service they want.	English, Urdu & Spanish
Nottingham	Polish, Urdu, Punjabi, Hindi and French	English, Urdu, Punjabi, Hindi and French
Oxford	Polish, Romanian, Bulgarian, Chinese and other Asian languages.	English
Peterborough	Polish, Lithuanian, Bulgarian, Urdu & Punjabi. Many customers who use this local office would prefer to transact in a different language, but in general will bring an English speaking friend with them	English, Punjabi & Urdu.
Portsmouth	Generally service customers who speak English as a first language, but customers who cannot speak English tend to bring someone to interpret.	English and sign language
Preston	English, Gujarati and Urdu.	English, Gujarati & Urdu
Sheffield	Languages from Iran. Slovakian, Polish, Kurdish, Somali, Chinese and Pakistani.	English, Hebrew & Arabic
Shrewsbury	Lithuanian, Polish, Iranian, Iraqi and Indian languages.	English, French, Spanish
Sidcup	Very diverse customer base. 50% non-English first language. 20% Eastern European. A single interpreter can attend with perhaps 6 customers and simultaneously support these customers whilst at the counter.	English, French, Spanish, German (with some Eastern European)
Stockton	Polish, several languages of Iran and Iraqi	English
Swansea	Welsh	English, Welsh
Theale	Nepalese and Polish	English
Truro	French, Spanish, Polish and Lithuanian	English , French, Spanish
Wimbledon	Polish, Romanian, Bulgarian, Spanish, Portuguese, Hindi, Urdu, Gujarati, French, Italian, Chinese, Japanese, Korean and Somali	English, Hindi, Urdu, Gujarati and French
Worcester	Mainly Polish, Latvian, Spanish, Portuguese, and customers generally go with friends and family.	English

Social demographics in parts of the UK are liable to dramatic change very quickly; therefore, this data provides a snapshot in time of the preferred languages used by DVLA local office customers across the country.

Currently, an estimated 0.25-0.5 million (10-20%) of all local office transactions involve customers who would prefer to transact in another language. In most of these cases the customer has sufficient English or uses the services of a friend/interpreter with the help of visual aids to complete the transaction with the local office clerk.

In all instances where an alternative language cannot be provided, the customer can opt to use the 'Big Word' translation service. This involves the local office clerk contacting the service by phone on behalf of the customer who would be invited to use a 'quiet' room. The transaction is then progressed via a three-way conversation involving the interpreter, customer and clerk. Setting the call up can take up to 15 minutes.

However, in practice, experience shows that customers tend to avoid using the 'Big Word' service preferring, where possible, to return with better English-speaking 'help'. The following table outlines the 'Big Word' service usage for 2011-2012.

Local Office	Service Usage of 'Big Word' (2011/12)	Local Office	Service Usage of 'Big Word' (2011/12)
Beverley Local Office	German Urdu x 2 Romanian Polish Romanian Korean Romanian Punjabi Czech	Bournemouth Local Office	Urdu
		Chelmsford Local Office	Latvian Romanian
Bristol Local Office	Polish x 3 German	Dundee Local Office	Russian
Chester Local Office	Polish x 8 Hungarian	Manchester Local Office	Czech x 3 Russian x 3 Latvian Polish x 2 Lithuanian Urdu x 2 Mandarin x 4
Glasgow Local Office	Farsi (Persian) x 2	Stockton Local Office	Mandarin
Ipswich Local Office	Polish x 3	Portsmouth Local Office	Polish

## **Impact**

The vast majority of 'Big Word' translations undertaken last year were for Eastern European languages. This sector could be at a disadvantage if a language service was not introduced via the intermediaries, although the service is available through the DVLA's Contact Centre.

Customers who do not speak English as a first language may struggle to understand the DVLA's forms and processes without face-to-face guidance from the local office. Some local offices display signs in other languages to reflect their local population as a visual aid to assist and direct customers. There is no guarantee that this would be provided by an intermediary.

Local office staff use a mixture of forms accompanied by hand gestures and occasionally use the expertise of waiting customers to help communicate and transact with the customers who have limited spoken English. It cannot be assumed that any intermediary chosen to carry out these transactions would offer a similar service. However, any localised front office counter service would be likely to reflect the community in which it is based. This could mean that other languages would be more readily available as a result.

Not all services will be offered through an intermediary and this informal translation service cannot be provided through electronic channels. A consequence of this is that customers who use different languages may not be able to understand the information provided to be able to meet their legal requirements. This may affect compliance. However, the anecdotal view from local offices is that many customers who do not have English as their first language can read and understand more English than they are able to speak.

All DVLA policies and practices reflect the responsibilities under the Welsh Language Act. Application forms held by intermediaries based in Wales, or sent by DVLA to Welsh postcodes, would provide information in both Welsh and English as standard.

## **How this will be addressed**

1. DVLA's contact centre will still have access to its dedicated language line and will be able to assist customers who cannot transact in English. Intermediaries will receive the necessary training and guidelines to support service delivery, for example the use of 'visual aids' where required.
2. Operational teams in Swansea will continue to use 'Big Word' translation service for telephone and written enquiries.
3. The DVLA believes that there would be no unlawful discrimination against customers who don't speak English as their first language if the proposals go ahead.

## Religion or belief

### Data/Impact

Statistics showing customer use of DVLA's local offices are not broken down by religion and no issues have been raised through consultation.

## Gender

### Data

Gender Data Considered		
	Female %	Male %
UK <sup>17</sup>	50.8	49.2
GB Driving Licence holders	46.7	53.3
Sample of DVLA local office visitors, May 2012	26%	74%

Our statistics on local office customers are not broken down by gender, although the snapshot exercise undertaken in May 2012 gives an indication of the gender split. This suggests that significantly more males use the local office than females but there is no evidence of a gender specific reason for this. This was not raised as an issue during consultation.

It is worth noting that by the second quarter of 2011, men were more likely to have used the internet than women, with 84.6% of men having used it compared with 80.1% of women<sup>18</sup>.

Assuming the gender split suggested by the snapshot exercise is representative of the local office customer base, more men than women will be directly affected by local office closure but they will not be specifically disadvantaged.

### How this will be addressed

1. Increasing the number of services provided by DVLA online may offer greater ease of access and customers will still be able to apply by post or through intermediaries if they cannot or do not access the internet.
2. Consideration is being given to ensuring that the alternative channels maintain current service levels. This is set out in the main impact assessment.
3. The DVLA believes that there would be no unlawful discrimination against customers of different genders if the proposals go ahead.

## Sexual orientation

The DVLA has not identified any impact.

## Marriage or civil partnership

The DVLA has not identified any impact.

<sup>17</sup> <http://www.ons.gov.uk/ons/rel/pop-estimate/population-estimates-for-uk--england-and-wales--scotland-and-northern-ireland/mid-2010-population-estimates/rf--mid-2010-population-estimates-poster.pdf>

<sup>18</sup> <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/2011-q2/art-internet-access-q2.html#tab=Sex>

## **Pregnancy and Maternity**

The DVLA has not identified any impact.

## **Carers**

### **Data**

Definitive statistics are not produced which provide a breakdown of people providing unpaid care in the UK, although this is estimated to be around 13%<sup>19</sup>. The DVLA does not hold statistics on local office customers who have caring responsibilities. The Agency recognises the link between gender issues and dependants, as statistically women are more likely than men to have dependants or caring responsibilities.

### **Impact**

Travelling times to the current spread of local offices may cause customers with dependants to incur additional care costs or require changes to their working patterns to balance work/life commitments. Should the proposals go ahead, many services will be available at a wider range of intermediaries or by post. Therefore, travelling time is likely to be reduced so benefitting customers with dependants.

Whilst DVLA's local offices offer seating for customers, which can be useful for those customers with dependants, it is accepted that intermediaries chosen to perform some DVLA functions may not offer this facility.

Most local offices offer car park spaces which can be important for those with dependants. Any intermediary that is chosen to perform some DVLA local office transactions may not be able to offer this dedicated car parking, which could cause difficulties for these customers.

In their consultation response, Carers UK emphasised that carers are generally very pushed for time and can find face-to-face transactions particularly burdensome. Introducing more electronic services, available 24-7, would be beneficial for this customer group. However, they felt that the proposals must be balanced to provide for those who do not have internet access.

The DVLA believes that there would be no unlawful discrimination against customers with caring responsibilities if the proposals go ahead.

### **How Addressed**

1. Increasing the number of services provided by the DVLA online may offer greater ease of access for customers with caring responsibilities.
2. Carers will continue to be able to apply by post or through intermediaries if they cannot or do not access the internet.
3. By moving many face-to-face services from the 39 local offices to a wider range of intermediaries, direct customer service will become available throughout most towns and cities in the UK. This may make it more convenient for carers by provision of a more localised service, whilst also eliminating the disadvantage to carers who do not have

<sup>19</sup> Source: ONS Census, 2001

a local office in their area.

### **Illiteracy and customer service**

DVLA customers who cannot read or write may currently rely on face-to-face customer service staff to help them to complete their applications.

The Literacy Trust estimates that around 16% or 5.2 million adults in England can be described as “functionally illiterate”. This means they would not pass an English GCSE and have literacy levels at or below those expected of an 11-year-old. They can understand short straightforward texts on familiar topics accurately and independently, and obtain information from everyday sources, but reading information from unfamiliar sources, or on unfamiliar topics, could cause problems<sup>20</sup>.

Around 10% of consultation respondents expressed concerns about literacy barriers in completing forms and understanding processes should the proposals go ahead.

There is concern that if the local offices were to close, intermediaries may not provide the same level of support to customers who need assistance to complete applications. Some services may not be provided by an intermediary, this may cause further difficulty for customers who rely on face-to-face assistance in understanding guidance and completing forms. These customers would need to use the contact centre or get support from friends/family/colleagues. Alternative methods of communication are also being considered.

### **How this will be addressed**

1. The Agency is considering whether face-to-face services provided by an intermediary could continue to provide the current level of support to customers. This is set out generally in the main impact assessment and would include support for those who need help to understand and complete forms.
2. The DVLA will ensure electronic systems are compliant with ‘AA’ classification to make information more straightforward, helping those with lower literacy levels.

### **Social inclusion – accessibility to services for those without bank accounts**

#### **Data**

A 2010 Financial Inclusion report by the Treasury states that there are 1.75 million adults in the UK that do not have a bank account<sup>21</sup>. The research also showed that whilst many consumers who do not have a bank account express a preference for managing their finances in cash, 26% have numeracy or literacy problems and 11% live in ethnic minority households. Taken as a percentage of the UK adult resident population, 3.54% of UK adults do not have a bank account, although it is not known how many of these would need to use DVLA services. The snapshot survey of local office customers suggested that 31% preferred to pay by cash.

#### **Impact**

DVLA local offices accept cash payments and their closure could affect those who are unable to pay for DVLA services by credit or debit card because they do not have a bank account. It is being proposed that entitlement to drive certificates (D441) will be available only by telephone. Unless alternative channels

<sup>20</sup> [www.literacytrust.org.uk/about/faqs/284\\_how\\_many\\_illiterate\\_adults\\_are\\_there\\_in\\_england](http://www.literacytrust.org.uk/about/faqs/284_how_many_illiterate_adults_are_there_in_england)

<sup>21</sup> [http://www.hm-treasury.gov.uk/fin\\_consumer\\_fininclusion.htm](http://www.hm-treasury.gov.uk/fin_consumer_fininclusion.htm)

are introduced, drivers without a credit/debit card will be unable to obtain an entitlement to drive certificate.

It has been accepted that cash payments would not be possible if purely electronic customer service channels are introduced or if intermediaries cannot accept cash payments.

### **How Addressed**

1. As is currently the position for customers who cannot or do not want to pay for their transaction by credit/debit card, DVLA would continue to accept postal orders with all vehicle and driving licence applications sent to the Agency.
2. Equality issues will be considered and discussions with prospective front office counter service providers will establish the basis for cash payments.

### **Social inclusion – accessibility to services for those without access to the internet**

#### **Data**

In 2011, 76% of UK households had access to the internet. The 24% without internet access could be due to geographical location, cost of computer, cost of internet, IT illiteracy or personal preference. According to a study by Ofcom, less than half (49%) of UK households on a low income have access to the internet<sup>22</sup>. Responses to the transformation consultation identified that 20% raised concerns around digital exclusion, computer literacy and the quality of internet service. For example, one private individual explained “where I live the signal is very poor and I find any internet activity very frustrating.”

#### **Impact**

The majority of services currently offered by the local office would be made available by an intermediary. However, several will only be available through electronic services or a postal route. Customers currently used to transacting face-to-face, and unable to take advantage of more online services, would have to rely on the paper channel. This may be considered more inconvenient and less reliable than the current face-to-face experience.

#### **How addressed**

1. Whilst customers without access to the internet will be unable to take advantage of online services, they will still be able to use intermediaries or a postal route.
2. The Agency is considering how to ensure that face-to-face services provided by an intermediary continue to provide the current level of support to customers. This is set out generally in the main impact assessment and would include support for those who need help to understand and complete forms.

### **Contact Details for the equality analysis assessment report**

- For further information about this Equality Analysis any other information related to the proposed closure of the DVLA's local office and enforcement network please email [lynette.rose@dvla.gsi.gov.uk](mailto:lynette.rose@dvla.gsi.gov.uk)

<sup>22</sup> <http://stakeholders.ofcom.org.uk/market-data-research/media-literacy-pubs/>



## Annex A: EA Record of Consultations/Involvement of Stakeholder Groups

Details of who was consulted or involved in the meeting/discussion e.g. Staff Networks, TUS etc	Date of consultation meetings etc	Issue/Concern Raised	Response Provided/Given
TUS	Regular meetings from 13 December 2011 21 December 2011 11 January 2012 2 February 2012 15 February 2012 13 March 2012 28 March 2012 10 April 2012 27 April 2012 17 May 2012 12 June 2012		
Disabled Motoring UK	4 April 2012	No concerns were raised. The view from the Disabled Motorists group was that there would be no additional burden to disabled motorists stemming from the proposals and that a better geographical spread could offer benefits to disabled customers. However, the importance of intermediaries' provision of facilities that are accessible to disabled people was emphasised.	
	16 April 2012	<p>If the offices were to close, transactions should not be available only online.</p> <p>What about disabled motorists and vehicle inspections?</p> <p>If the network were to close, DVLA must ensure that this service is available in at least as many locations nationally with the same geographic spread.</p>	<p>No intention to replace existing paper/telephone channels with online. People who do not or cannot access the internet will not be disadvantaged.</p> <p>It is likely that inspections will still be required for adapted vehicles. DVLA will work with other organisations to provide this service.</p> <p>By providing DVLA services through intermediaries, transactions with the Agency could be completed in many more locations across the country.</p>

ACAS Wales	9 March 2012	The current arrangements might provide useful on-hand services to older, poorer and disabled people, but it is not a very fairly distributed service if we only cater for 39 towns and cities. What about the rest of the country?	Passing some DVLA work on to intermediaries and enhancing electronic services could be beneficial for the affected groups as a whole
Transformation Consultation document.	13 Dec 2011 – 20 March 2012	<p>DVLA received 984 unique responses to the “transforming DVLA Services” consultation. The following response groups expressed concerns over at least one issue of social inclusion.</p> <p><b>Private individuals</b> 40% of this group expressing concern over at least one inclusion issue, including specific sections of society being unable to use services offered electronically or through intermediaries because of physical disability, literacy, computer access or age.</p> <p><b>Interest Groups</b> The main concern expressed by this group was the issue of digital exclusion. Over 33% of responses from interest groups specifically mentioned this. Some concerns were raised regarding the physical inspection of specialist vehicles and how they would be carried out in future. This is particularly relevant for disabled drivers of vehicles with adapted vehicles that require inspection. Carers UK and Disabled Motoring UK stated that the proposals would improve DVLA's services and bring about a positive equality impact due to the 24-7 nature and increased accessibility brought by online services.</p>	<p>We are unable to reply individually to the points raised.</p> <p>However, a summary of responses will be published on <a href="http://www.dft.gov.uk/DVLA/transformation">www.dft.gov.uk/DVLA/transformation</a> Those who responded to the consultation will be notified when this happens. Additionally, the areas of concern raised about equality issues have been considered within this equality analysis.</p>

**Transport and Logistics**

This group also expressed concerns around digital exclusion or computer literacy, with this issue being raised by almost 20% of the respondees within this group.

**Local Government**

This group also felt strongly about the potential effects on society with 39% of responses mentioning digital exclusion.

**DVLA Employees**

Of eighteen respondents, five raised concerns around language issues and three raised issues of digital exclusion.

## Annex B

DVLA's network of local offices carries out a diverse range of functions and the tables on the following pages show in more detail how the most common transactions could be made available if DVLA's Local Offices were to close. The tables also identify whether any specific equality group could be disproportionately disadvantaged by the proposed change.

	Product	Current Channels	Future Channels (potential)	Equality Groups Impacted
Vehicle Registration	1. Used Personal Import V55/5	Local Office	Postal	<p>Language – Local Office staff offer help to non-English speakers when completing their forms. Insisting on postal/email applications will cause those customers to seek assistance elsewhere to be able to complete their application, such as friends, family or DVLA's contact centre which provides the Big Word translation service.</p> <p>Disability &amp; Age – Disabled or older customers may benefit from the introduction of postal application routes for transactions that are currently available only by travelling to a DVLA Local Office.</p> <p>Pregnancy and Maternity – These customers will no longer have to attend the Local Office to complete these transactions and are likely to benefit from the improved flexibility of postal transaction.</p>
	2. New Vehicle V55/1		Postal/AFRL	
	3. New Personal Import V55/4		Postal	
	4. Other V55/5		Postal	
	5. Q Plate Other V55/5		Postal	
	6. Q Plate Used Personal Import V55/5		Postal	
	7. Q Plate Kit Build V55/5		Postal	
	8. Q Plate Kit Conversion V55/5		Postal	
	9. Q Plate False Identities		Postal	
	10. Q Plate Rebuild V55/5		Postal	
	11. Q Plate Discovered Vehicle V55/5		Postal	
	12. Visiting Forces		Postal	
	13. New Trader Import V55/2		Postal	
	14. Discovered Vehicle V55/5		Postal/AFRL	
	15. Rebuilt V55/5		Postal	
	16. False Identities V55/5		Postal	
	17. Kit Conversion V55/5		Postal	
	18. Kit Build V55/5		Postal	

Vehicle Registration	19. Off road registration	Local Office	Postal	
	20. Temporary 'Q' Plate		Postal	
	21. EX-MOD		Postal	
	22. Reconstructed Classic Vehicles		Postal	
	23. BFG Vehicles		Postal	
	24. Small Island HGV		Postal	
	25. Cloned Vehicles		Postal	
	26. Prototype Vehicles		Postal	
	27. Disabled Passenger Vehicles		Postal	
	28. Mobility Scooters		Postal	
	29. Crown Vehicles		Postal	Language, Disability & Age – As above
	30. Police Vehicles		Postal	N/A
	Personalised Registration		1. CTs V317 (ITT 127) processed within 7 days	Local Office
2. Retention Application V317 (ITT 126)		Postal/Via intermediary online (Phase 1)		
3. Retention Assignment V778		Postal/Via intermediary online (Phase 1)		
4. SOM Assignment V750		Local Office/AFRL	Postal/AFRL/online (future phase)	Language
5. CTs V317 (ITT 127) processed over 7 days		Local Office	Postal/Via intermediary online (Phase 1)	No Equality Impact identified due to selection of channels available
6. Add/Change a nominee & extension			Postal/online (future phase)	Language

Vehicle Services	1. Exchange Licence Application V70	Local Office	Postal	Language
	2. Vehicle Registration Certificate Application V62	Postal/Local Office	Postal	No equality issues have been identified
	3. Vehicle Registration Certificate Changes V5	Postal/Post Office/Local Office	Postal/Intermediary	As above
	4. VED Licence Refund Application with Disc V14	Local Office Post Box <sup>23</sup> / Postal	Postal	Language – Local Office staff currently help non-English speakers complete their forms. Insisting on postal/email applications will cause those customers to seek assistance elsewhere to be able to complete their application, such as friends, family or DVLA's contact centre which provides the Big Word translation service.  Illiteracy – Those who are illiterate could struggle to complete the application on their own as they often previously relied on the Local Office staff for assistance.
	5. VED Licence Refund Application without Disc V33		Postal	
	6. Temporary Vehicle Registration Certificate V379	Local Office	E-mail	
	7. Personal Export		Postal	
	8. Direct Export		Postal	
	9. New Means of Transport		Postal	
	10. Export Certificate	Local Office/ Fax/Postal	Postal/E-mail	

<sup>23</sup> "Local office post box" – This service is used by customers who want to manually deliver an application to a local office, which is then sent on to DVLA Swansea for processing.

Licensing	1. VED Licence Application V10	Local Office or Post Office	Intermediary	There will be little change to the service provided as more applications will be possible through an intermediary. However, a very small number of licensing transactions, that can only be currently completed at a local office, will no longer be possible. This will only apply to applicants without the appropriate vehicle documentation and no significant equality impacts have been identified.
	2. Duplicate VED Licence Application V20	Local Office	Intermediary	As above
	3. VED Licence Renewal Application V11	Local Office/ Post Office/ Electronic Vehicle Licensing	Intermediary/ EVL online and phone	No Equality Impact identified due to the same selection of channels available with face to face services being provided by an intermediary.
	4. HGV VED Licence Renewal Application V85/1	Local Office/ Post Office/ Electronic Vehicle Licensing	Intermediary/ EVL online and phone	As above
	5. HGV VED Licence Application V85	Local Office	Intermediary/ Postal	No additional impact identified as the service can continue to be provided by an intermediary and an additional postal route is being introduced.
	6. Duplicate EVL Issued Licence Application	Local Office	Intermediary	No additional impact identified as the service can continue to be provided by an intermediary
	7. SORN by V11	Local Office/ Post Office/ Electronic Vehicle Licensing	EVL online and phone	Illiteracy – Those who are illiterate could struggle to complete the application on their own as they often previously relied on the Local Office staff for assistance.
	8. SORN by V85/1	Local Office/ Post Office/ Electronic Vehicle Licensing	EVL online and phone	
	9. SORN by V890	LO/PO/Postal	Postal	
	10. Voluntary Arrears of Duty	LO/Telephone/ Postal	Telephone/Postal	No Equality Impact identified due to the remaining range of channels available
	11. Replacement Licence Application CLO141	LO/Postal	Postal	Language – Licence holders from non-English speaking countries may struggle to complete the application form if they cannot access a face to face service
	12. Licence with a Tax Class change	Local Office	Intermediary/ Postal	

Drivers Services	1. GB National Post Box	Local Office	Postal	Illiteracy – Those who are illiterate could struggle to complete the application on their own as they often previously relied on the Local Office staff for assistance.	
	2. Foreign National Post Box		Postal		
	3. Foreign National Premium		Removed		N/A
	4. Digital Tacho – GB Post-box		Postal		Illiteracy – As above.
	5. Digital Tacho – Cards Issued	Distributed centrally	Distributed centrally	N/A	
	6. GB National Premium	Post Office/ Local Office	Removed	N/A	
	7. Digital Tacho – Foreign Post-box	Local Office	Postal	Language – Licence holders from non-English speaking countries may struggle to complete the application form if they cannot access a face to face service.	
	8. Certificate of Entitlement D441	Local Office/ Telephone	Telephone	No additional burden identified for any group.	
	9. Digital Tacho – Foreign Premium	Local Office	Removed	N/A	
	10. Digital Tacho – Cards Not Issued	Distributed centrally	Distributed centrally		
	11. Digital Tacho – GB Premium	Local Office	Removed		
Inspections	1. Inspection (VCS)	Local Office	Intermediary	No impact is anticipated as an intermediary with at least an equal geographical coverage will continue to perform this function.	
	2. Inspection (Trade Plates)		Removed		N/A
	3. Inspection (Cherished Transfer)		Intermediary	No impact is anticipated as an intermediary with at least an equal geographical coverage will continue to perform this function.	
	4. Inspection (Rebuilt)		Intermediary		
	5. Inspection (Other)		Intermediary		
Trade Licensing	1. Duplicate Trade Licence	Local Office	Postal	Language – Local Office staff currently help non-English speakers complete their forms. Insisting on postal/email applications will cause those customers to seek assistance elsewhere to be able to complete their application, such as friends, family or DVLA's contact centre which provides the Big Word translation service.	
	2. Replacement Trade Licence		Postal		
	3. Trade Licence (Renewal Application)		Postal		
	4. Trade Licence (First 5. Application – Probationary)		Postal		
	5. Trade Licence (Other)	Local Office	Postal	Illiteracy – Those who are illiterate could struggle to complete the application on their own as they often previously relied on the Local Office staff for assistance.	
	6. Refund	Local Office	Postal		



Dips & Cons	1. Diplomatic/Consular Driving Permit D442	Local Office	FCO-Secure E-mail	Language – People who lack strong written English skills will be unable to complete an application for diplomatic/consular documents by direct email.
	2. Diplomatic/Consular Registration Certificate V117	Local Office	FCO-Secure E-mail	
AFRL	1. AFRL Appointment (collection of discs)	Local Office	Centralised disc distribution	N/A
	2. De-registration	Local Office	E-mail/Telephone	Disability& Age – Disabled or older customers may benefit from the introduction of postal application routes for transactions that are currently available only by travelling to a DVLA Local Office.
	3. Incorrect Registration of a Vehicle	Local Office	Postal	Language
	4. AFRL Dealer Audit	Local Office	Removed	N/A
Enforcement	1. Payment of Enforcement Fine i.e. CR, CIE	Local Office/ Postal/ Telephone	Postal/Telephone	None Identified.
	2. Secure VED Licence holder	Local Office	Postal	<p>Illiteracy – Those who are illiterate could struggle to complete the application on their own as they often previously relied on the Local Office staff for assistance.</p> <p>Language – People who do not speak English would struggle to complete this application form.</p>