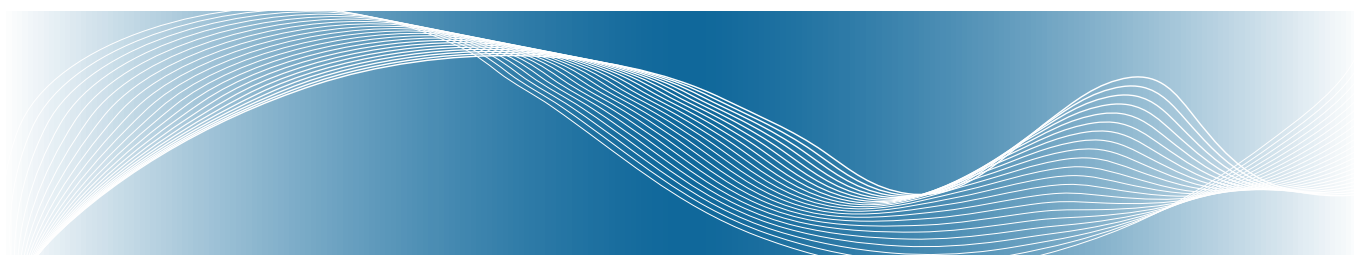


Impact Assessment

Annex D

Summary of Responses



Contents

Introduction.....	3
The consultation.....	4
Response distribution.....	5
Recognising segments.....	6
Capturing the views.....	7
Executive summary.....	8
Private individuals.....	9
Dealers.....	11
Interest groups.....	13
Transport & logistics.....	15
Fleets.....	17
Local government.....	19
Employee and trade unions.....	21
Trade bodies and key stakeholders.....	23
Police and counter fraud associations.....	25
Public sector.....	27

Introduction

The Driver and Vehicle Licensing Agency (DVLA) has a long and successful record of meeting its customers' needs. In order to keep pace with customers' rightly higher expectations, the DVLA must now go through a significant process of change. This means moving away from a largely paper based organisation to a modern, highly efficient electronic business which provides online services to motorists and businesses.

The DVLA is constantly reviewing the processes that support the handling of more than 200 million customer interactions each year. As well as providing improvements to the customer experience, transformation will deliver sustainable long term savings in line with the Government's commitment to digital services.

The DVLA has led the way in Government in providing electronic service channels and has drawn on public and private sector best practice to make transactions easier and more secure. The DVLA now wants to take this further by providing wider choice around how and where customers use its services. This work will build on the success of the existing Electronic Vehicle Licensing (EVL) and Driver Licensing Online (DLO) services. The DVLA is looking to increase the range of transactions available online and how it can make customer interactions even more convenient by using a wider range of front office counter services.

This is an ambitious programme of change. The DVLA believes the proposals set out in the consultation paper will best deliver these changes, but invited views from the public to help decide on the steps to take.

This document provides a clear summary of all responses received.

The consultation

On 13 December 2011, the DVLA launched a public consultation called Transforming DVLA Services.

The objective of the consultation was to invite views from the public which the DVLA could use to develop the way in which it operates, in line with its core principles and objectives, and to identify any unintended consequences of the potential changes.

The consultation was originally scheduled to close on 6 March 2012 but this was extended by 14 days to take into account the Christmas holiday period, meaning that the consultation ended on 20 March 2012.

The consultation document and an electronic reply form were available on the DVLA's section of the DfT website as well as the DVLA's own corporate website. A link to the consultation was also provided on the motoring pages of the direct.gov website. The DVLA also provided an email address and a postal address as alternative response channels.

During the consultation period, some of the DVLA's senior managers and other representatives visited a number of businesses and stakeholders to answer questions.

The consultation was based around the following questions, although responses via freeform emails, letters and from those that chose to channel their views via their MP or Ministers were also included.

- Question 1: Do you support the direction of the changes being proposed?
- Question 2: Do they raise issues for you and, if so, what are they?
- Question 3: What kind of services would you like to see being delivered through: Electronic Services: Intermediaries
- Question 4: What would be of most benefit to you?
- Question 5: If you don't currently use the DVLA's online services, why not?
- Question 6: Would you use electronic channels if access was provided through a local service or business operating as an intermediary?
- Question 7: If not, what other ways could we help you to use electronic services?
- Question 8: In view of the above, what problems would you foresee with the centralisation of the functions currently provided by the DVLA's 39 Local Offices (LOs) and 10 Enforcement Offices?

The DVLA is grateful to all who responded and took the time to help inform the way forward in Government services.

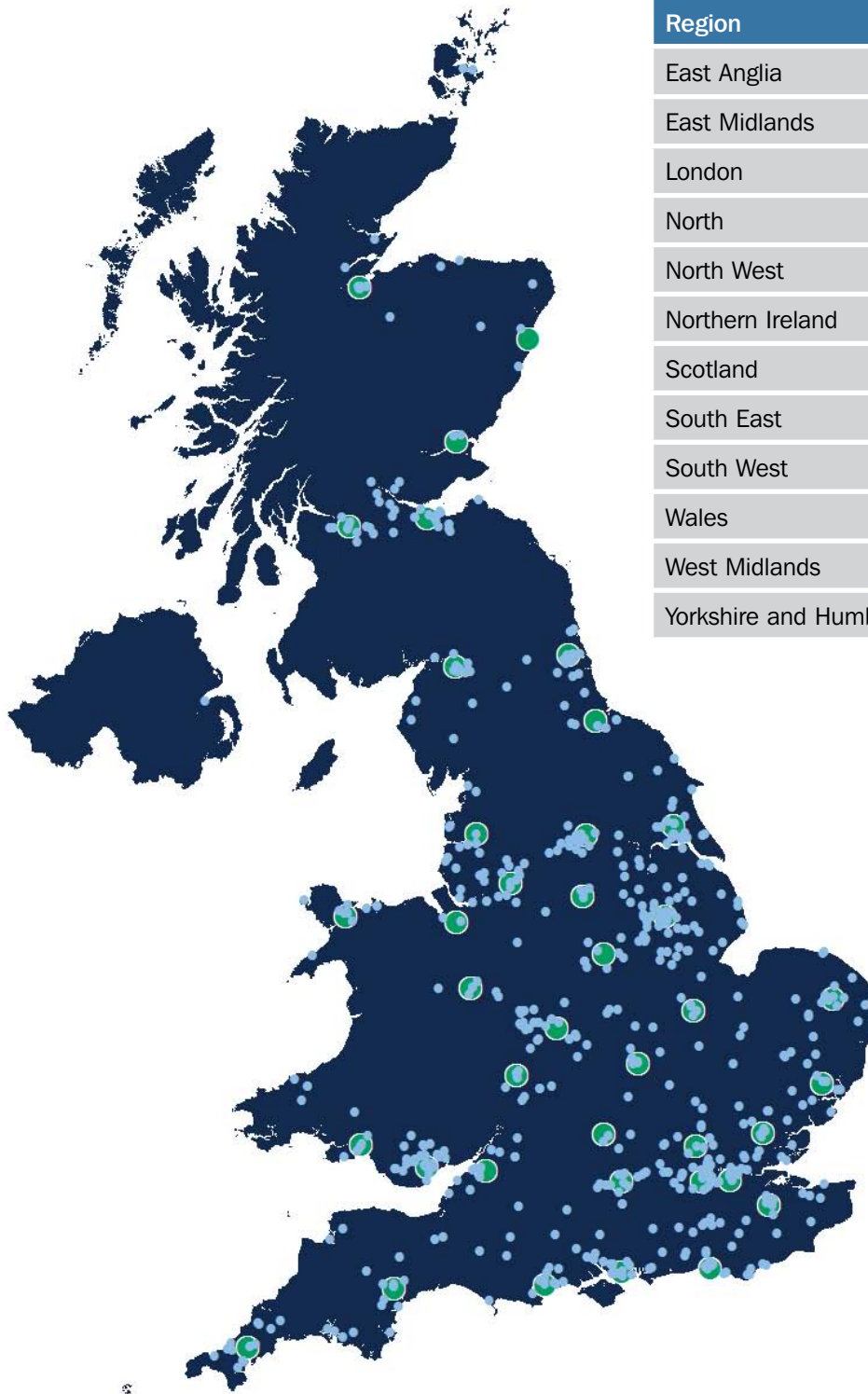
Response distribution

The blue dots on the map below show the origin of the responses that had valid postcodes.

Of the 1015 responses, 687 postcodes were recognised.

30 were not recognised and 297 were not provided.

The large green dots show the location of the 39 DVLA Local Offices.



Region	% of responses
East Anglia	6%
East Midlands	14%
London	5%
North	6%
North West	5%
Northern Ireland	0.1%
Scotland	8%
South East	23%
South West	10%
Wales	8%
West Midlands	6%
Yorkshire and Humberside	9%

Recognising segments

The 1015 responses to the consultation were received from a wide cross section of the public, industry, motor trade and other representative groups.

The responses were grouped into ten segments to allow the responses to be analysed in context and to avoid ambiguity.

The ten groups and how they make up the sample are:

Private individuals	500	50.81%
Dealers	270	27.44%
Interest groups & representative organisations	62	6.30%
Transport and logistics	53	5.39%
Fleets	27	2.74%
Local government	24	2.44%
Employees and trade union	18	1.83%
Trade bodies and key stakeholders	13	1.32%
Police and counter fraud associations	9	0.91%
Public sector	8	0.81%

31 (3%) of the responses were removed from the statistical analysis and the table above as some responses were received twice via different channels, they were customer satisfaction forms or were simply requests for a hard copy of the consultation.

Private individuals are those who are responding from a personal point of view and are not representing or acting on behalf of any other body.

Dealers are categorised as those respondents that are responding as an employee or manager of a dealer. Dealers are defined as 'selling' businesses. Car dealers, truck dealers and number plate suppliers are included in this group.

Interest groups & representative organisations include responses that are representative of a larger group of people. This includes car enthusiasts' clubs, owners' clubs and disability representative groups.

Transport and logistics are responding on behalf of their company. The company will be a provider of goods or services and use vehicles as 'tools' in order to carry out their business.

Fleets are responding on behalf of their company. These companies will be in the business of providing vehicles to form a fleet. The vehicle fleet itself is the 'product' that they sell.

Local government respondents are responding on behalf of local authorities of all types.

Employees are those who have identified themselves as employees of either the DVLA or the DfT Shared Services Centre. This includes the PCS Trade Union response.

Trade bodies and key stakeholders are representing a larger trade body such as The Society of Motor Manufacturers and Traders (SMMT), British Vehicle Rental and Leasing Association (BVRLA) or is a key stakeholder in DVLA activity.

Police and counter fraud associations representatives from local police forces or stations and include groups such as ACPO Vehicle Crime Intelligence Service (AVCIS) and Association of Chief Police Officers Scotland (ACPOS) also including not for profit organisation the UK's Fraud Prevention Service (CIFAS) because of the similarity of the types of industry they are involved in.

Public sector represents emergency services, excluding the police and any other civil servant groups, including Armed Forces.

Capturing the views

The consultation sought the public's views through eight core questions. However, people often wished to express their views outside of the framework that the questions provided. Some respondents used single word answers; others used the questions as the basis for a fuller response while others wrote freeform responses that did not follow the questions at all. All responses were assigned a unique reference number and this number is retained through all of the analysis, and will be used when referencing quotes and sectors.

To be able to capture the views of the public across such a varied range of responses, each response had to be read individually and a matrix of points, issues, concerns, thoughts and feelings was derived. This was done by adding categories to a spreadsheet as and when they appeared through the responses. Where a response raised something that had been brought up in other responses, an 'X' was placed in that column. Where a response raised something that had not been raised previously, a new column was created to capture that point.

In total, 104 categories were created. This method enabled issues to be quantified, the most common themes, thoughts and concerns to be highlighted and helped to show what was motivating people to take the time to respond to the consultation.

There was no limit as to how many 'X's could be inserted from one response. Some responses only raised one point, and did this so concisely that it only had a single 'X'. Some more comprehensive responses raising multiple points had over 50 'X's. But the average was around seven.

No weighting was applied to any response. All responses and individual points made in those responses were given equal merit, whether it was from an organisation representing thousands of members, or from a private individual expressing a personal opinion.

This was because the consultation was designed to capture people's views and the DVLA wanted to ensure that any decisions taken would not be based on or influenced by a simple "vote" of numbers. With this in mind, weighting a response offered no benefit to the decision making process but may have led to lesser noted points being diluted.

Executive summary

There were 1015 individual responses to the consultation. Upon analysis, 12 of these were excluded as seven were normal Customer Satisfaction forms, three were customer feedback surveys, there was one response from a consultancy firm offering their services and one provided minutes of a meeting.

Of the remaining 1003 responses, there were a number of duplicate submissions. These duplicates were removed to give a final figure of 984 unique responses to the consultation.

The majority of respondents were against the proposals set out in the consultation document with 79% answering “no” when asked if they support the changes. Of the rest, 8% of respondents agreed with the proposals while 13% agreed to aspects of it.

The largest concern overall, expressed by 45% of respondents, was that the face-to-face contact that many customers value will be lost.

The value attributed to face-to-face contact can be further qualified, as approximately one-third of respondents mentioned specifically that the DVLA local offices add value to their transactions or that they trust the knowledge and expertise that the staff provide.

Despite this, 37% of respondents commented that they are either current users of the DVLA's electronic services or would benefit from additional electronic services.

The main concerns raised about the use of electronic services were that they are often unsuitable for complex transactions and any delays in turnaround times could cause problems for customers. Both concerns were highlighted by 26% of respondents. Specific concerns about turnaround times relate to the delays in receiving a tax disc as a result of centralising services at the DVLA's headquarters in Swansea. About one in five respondents mentioned this.

Over one-fifth of respondents expressed concern that the alternative channels for transacting with the DVLA are not ready to replace the current services provided by the local offices.

Private individuals

Private individuals made up half of the responses to the consultation. The majority of responses from private individuals said that they did not agree with the changes proposed.

Over half the responses from private individuals cited the reason for objecting as the value they place in face-to-face channels as a preferred method of communicating with the DVLA.

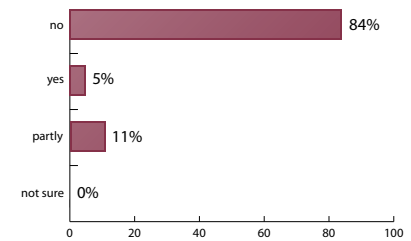
This may be largely due to the strong feeling of trust in the knowledge and ability of the Local Office staff. Around one-fifth of responses mentioned this.

In addition to trust in what is currently available, there is also evidence of concerns about the proposed alternatives. Concerns were expressed that the alternative service options will not be ready in time to ensure a fluent transition. There were also specific concerns over the quality and security of the intermediary staff.



506 – “Outsourcing any of the work done in the Local Offices could increase corruption and would necessitate employing additional public servants to monitor their work. The National Audit Office and Audit Commission would have to grow considerably... I am not aware that there has been a pilot study of this proposed change and the likely effect of closing local DVLA offices.”

Do you agree with the proposals?

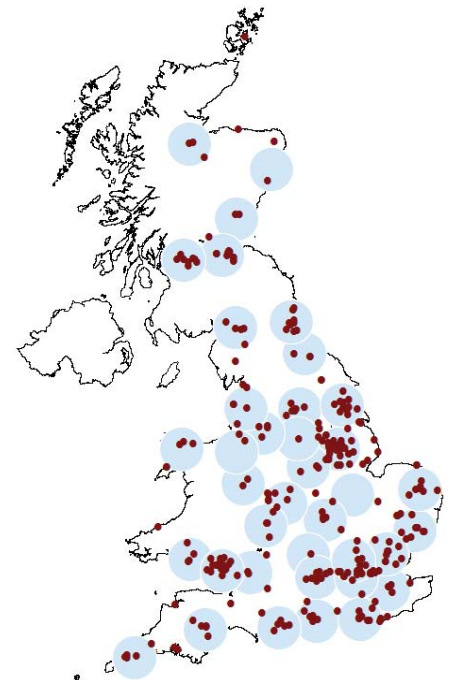


Nearly 40% of respondents in this group expressed concern over at least one inclusion issue. Concerns expressed include specific sectors of society possibly being unable to use the services offered by the alternative electronic or intermediary channels because of physical disability, language barriers, literacy, computer access or age.

547 – “Not everyone has a computer. Some transactions are complicated so face-to-face help ideal. I can see an unholy mess from many forms being filled in incorrectly. Some people do not cope with forms. What will you do with the illiterate? What will you do with those who do not speak fluent English?”

However, very few responses specifically mentioned that they had any concerns about language being a barrier.

Concerns over the turnaround of documents in the event of services being centralised at the DVLA in Swansea also featured highly in this category.



Top ten points raised:

- 1 Value face-to-face
- 2 Concern that electronic channels are unable to serve complex transactions but fine for more simple transactions
- 3 Pro electronic or are already a current electronic user
- 4 Concerned digitally excluded and computer illiterate people may be disadvantaged
- 5 Possess a strong faith in Local Office staff's knowledge and ability
- 6 Concerns over user experience or lost added value
- 7 Concerns over the turnaround of documents
- 8 Concerns over quality or security of intermediary staff or services
- 9 Concerns over waiting or access time
- 10 Concerns that alternative channels will not be ready to replace Local Office functions

Respondents were concerned that if they needed to send their documents to or transact via Swansea, it would detract from the service they currently receive. Some respondents also said that they would prefer electronic channels only if it was wholly electronic and that the postal channel did not form part of that service.

123 – “Simple matters such as cherished transfers could be achieved electronically but there is then the issue of getting documents back through the post...”

Nearly a third of this group recognised that electronic channels would be acceptable to deal with simple transactions, but expressed concern that they would not be suitable for the more complex transactions.

Just over a quarter of private individuals already considered themselves electronic users, or were in favour of electronic services. It was interesting to note that of those who did not specify whether they were in favour of electronic services or if they were a current user of them, they had nearly three times more concerns over quality, security, user friendliness and reliability of electronic channels than those who had stated that they currently use electronic services.

They were less keen on moving toward services delivered by intermediaries with only 14% expressing that it would be a positive move. When considering their fondness for face-to-face, their concerns over the quality of intermediaries and the strong faith in Local Office staff, it is possible that their anxieties are that the intermediaries will not be able to deliver the service currently provided by the Local Offices.

421 – “...Also. I don't really like having to provide my bank or credit card information on line. I certainly would not be happy about having to provide it on line or direct to an intermediary.”

One-tenth of respondents said that the proposals would mean that they would be concerned about having to travel further to conduct their business with the DVLA. However, it should be noted that it was a common misconception that the DVLA would be requiring customers to travel to Swansea to transact.

Private individuals also valued the customer experience and were concerned that an alternative method of service delivery would not include the 'added value' that is provided by 'seeing a real person'. They particularly mentioned assistance with completing and checking forms, along with help with more complex or unusual situations. However, more than one-third mentioned that they had also experienced some difficulties or dissatisfaction with the DVLA's phone service.

11% of respondents expressed concerns that implementing the proposals could lead to increased non-compliance with various aspects of the law or increased opportunity for fraud.

Dealers

Dealers made up just over a quarter of the responses to the consultation and nearly four-fifths of dealers did not agree with the proposals set out in the consultation.

The largest concern for this group, with two-fifths mentioning it in their response, is the impact the closure of the Local Offices could have on their business. They were mainly concerned about maintaining their ability to meet customer demand if the Local Offices are closed.

415 – “Over the years we have had many problems with DVLA, mainly where processing times were taking too long which resulted in our loss of earnings, whereby vehicles awaiting documents would depreciate in value over a period of time as we would be unable to sell them on.”

A third of this group believe that DVLA systems are not in place or ready to deal with the proposed closures. The main areas that they feel are not ready are the ability to change tax class, administration of cherished transfers and deal with taxing a vehicle. Whilst they recognise that these transactions can currently be done via alternative channels, they fear that fulfilling these services via alternative channels will have a delay that will directly affect their ability to meet customer demands. They state they need to be able to change the tax class of a vehicle, get a tax disc immediately and complete a cherished transfer on the same day.

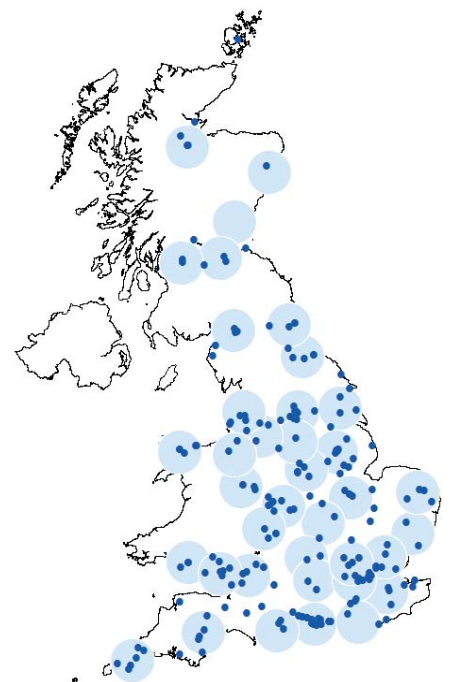
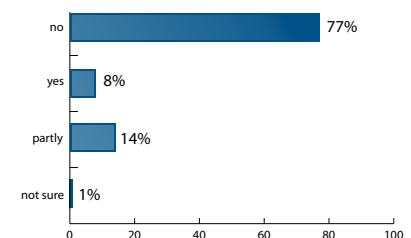
7 – “1) If we sell a used car on a Friday and the customer wishes to place the Reg.No. he has on a retention certificate onto the car, we can send a driver to our local DVLA office immediately, the car is taxed straight away and the customer can then collect his car the next day – this would certainly not be the case if we had to send documents via the post.

2) exactly the same applies if the car they are buying is a ‘disabled’ class, we currently send a driver and he is back within an hour with a tax disc, again this won’t happen if we have to rely on post or electronic services.”

Dealers tend to have a standard set of procedures or transactions that dominate their interaction with the Local Offices. They feel reliant on the knowledge and expertise of Local Office staff and often say how much they appreciate the added value provided by staff, for example when checking forms and ensuring they have been completed correctly. One-third of dealers also stated that they value the face-to-face service delivered by the Local Offices.



Do you agree with the proposals?



Top ten points raised:

- 1 Impact on ability to meet customer demand/service/lost business
- 2 Welcome increased services from digital
- 3 Value face-to-face
- 4 Concerns over ability to change tax class.
- 5 Concerns over the turnaround of documents
- 6 Concerns that alternative channels will not be ready to replace the LO
- 7 Mention that the delay obtaining a tax disc from centralisation will be an issue.
- 8 Pro electronic or are already a current electronic user
- 9 Mention that the delay obtaining the documents for a cherished transfer would be an issue
- 10 Customer service would be impacted by losing same day CT

The dealers favoured use of electronic channels (36% welcome increased services through electronic channels) as opposed to intermediaries (23%). They largely welcomed the proposed increase in electronic services and few mentioned any perceived security risks. There was almost three times the amount of responses mentioning a concern over the quality or security of intermediary staff when compared to the security of electronic channels.

Dealers do not define their transactions as complex and as such welcome more services being available through digital channels. However, around one-fifth of dealers specifically mentioned that they view electronic services as suitable for simple transactions only.

684 – “...Many transactions rely on paper documentation, complex form filling and face to face meetings. In my experience on line and telephone services at best provide an alternative for simple transactions and at worst are frustrating, obstructive and almost impossible to use for those who are not IT literate.”

Dealers expressed little concern for potential job losses or any other impact on wider social issues like digital exclusion or disability affected groups. Ultimately, dealers focused on their ability to deliver customer service to their own customers. It was interesting to note that different dealers had different requirements in the types of transactions they use. The mass market dealers expressed more of a need for change of tax class and licensing, whereas the prestige and luxury dealers were more concerned about number plate transfers being completed on the same day.

Nearly one-third of responses from dealers specifically mentioned at least one issue with dealing with the DVLA by phone. One in five said there was anxiety about sending documents to the DVLA in Swansea by post because they were concerned that they would not reach their destination.

228 – “I waste more time hanging on the DVLA phone lines, than anything else. Documents get lost when they are sent to Swansea, and whilst the staff are charming and helpful when you finally get through on the phone, more often than not I am hanging on the phone for ten or twenty minutes, that is, if I actually manage to get past the first hurdle of making it onto the queue, instead of being summarily disconnected by the automated service...”

Interest groups

This group is made up of the most diverse range of customers, spanning car clubs, owners' clubs, disability and carers' action groups. This group included the most positive responses to the proposals, leaving just over half of respondents opposing the change.

The main concern expressed by this group was the social aspect of digital exclusion. Over one-third specifically mentioned this. This could be as a result of the ageing demographic of those people concerned with the restoration of historic vehicles.

607 – “The people I deal with in relation to registration applications are often in their 50s/60s and are very often computer illiterate. They do not know how to switch the computer on let alone use it. If these offices close how are these people going to make applications. I feel they will be severely disadvantaged!!.”

Many of this group value the face-to-face service they receive at the Local Offices, with one in five respondents saying that their “specialist” transactions can often be too complex for electronic methods to be effective.

Due to the complexity of the transactions involved, the interest groups expressed a particularly strong level of trust in the knowledge and expertise of the Local Office staff, the immediacy that comes with applying via a Local Office and they were concerned about how the physical inspections of these specialist vehicles will happen. The majority of respondents mentioned at least one of these points.

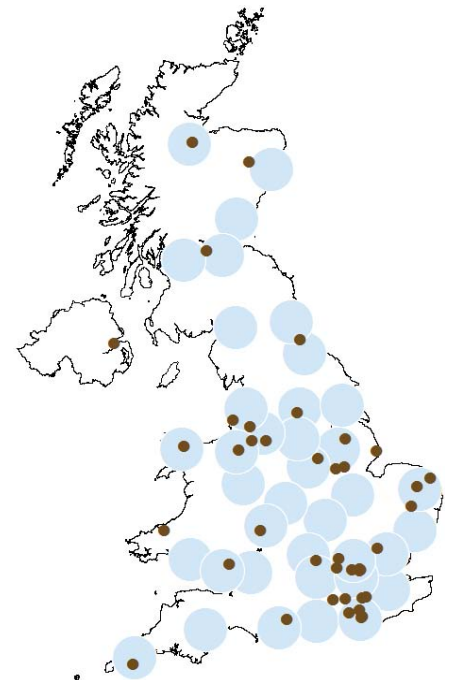
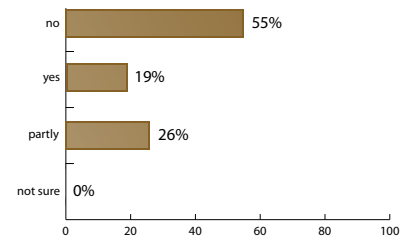
Another concern, largely expressed by the car owners' clubs and historic restorations enthusiasts, is the potential for original and historically valuable or significant documents being lost in transit. These are currently checked manually at the Local Office upon registration or re-registration without any risk.

567 – “Currently our members use the services of DVLA Local Offices when importing historic/classic vehicles. This involves the production of documents which can be scanned and authenticated or presented in person. This cannot be done electronically and would involve a postal application, which the associated risk of irreplaceable documents being lost and an inevitable delay.”

It is interesting to note that there are two distinct sub-groups within this main group. One of these expressed strong concerns over digital exclusion, whereas a second sub-group of the same size are either current users of the DVLA's electronic services or said that they would welcome additional electronic services. The reasons for the support of online services are particularly varied in this group with the Information Commissioner's Office citing the potential for improved accuracy of the DVLA's records.



Do you agree with the proposals?



Top ten points raised:

- 1 Concerned digitally excluded and computer illiterate people may be disadvantaged
- 2 Value face-to-face
- 3 Concerns on how physical vehicle inspections will be performed
- 4 Pro electronic or are already a current electronic user
- 5 Would like to keep things as they are, maintain the status quo
- 6 Concerns over time delays taken for new registrations/imports/specialist/non AFRL Transactions
- 7 Concerns about having to have original/valuable original documents checked
- 8 Concerns that alternative channels will not be ready to replace Local Office functions
- 9 Welcome increased services from digital
- 10 Concerns over user experience or lost added value

993 – *“The Information Commissioner’s Office is also in favour of your proposals to make it easier for customers to comply with their legal obligations to ensure that records are accurate and up-to-date..”*

There is a concern expressed among other groups in the responses to the consultation that disabled or vulnerable groups will be disadvantaged by the proposals. It is interesting to note that this is contradicted by CarersUK and Disabled Motoring UK, who stated that proposals would actually improve the DVLA’s services, citing the 24-7 nature and increased accessibility online services bring and would be of benefit to these groups.

884 – *“We have been carrying out an extensive piece of work on carers and their interaction with technology. Our findings are that people who care, unpaid, for disabled or older relatives are usually extremely pressed for time and cannot always make face to face transactions or even post things. Technology which allows services to be provided 24 hours a day, 7 days a week, are incredibly important and actually give a certain group of carers better and greater accessibility that they would otherwise have. The degree to which you are able to move more services online, will increase many carers’ access to those services and make things much easier and more convenient. In other words, there would be a positive equality impact.”*

There is a concern that alternative channels will not be ready and that additional burden will be placed on stakeholders to find answers to our short term resolutions. They go on to say that this will be in addition to investing in the solutions as and when DVLA’s long term measures are achieved.

791 – *“This is an opportunity to make a step change in the speed, quality and accuracy of the registration process. However the planned IT development program is not due to deliver until well after the local offices are expected to close. The MCI feels that to get the best for the DVLA and stakeholders alike, the transfer of services to electronic should be integrated with the IT roll out. This would eliminate the need for costly, disruptive, unsatisfactory and short term interim measures”*

Transport & Logistics

The Transport and Logistics sector accounted for just over 5% of responses. The majority of this group said that they did not agree with the changes proposed in the consultation.

The two largest reasons for the objections of this group were over turnaround times caused by centralisation of processes at the DVLA in Swansea and the value placed on face-to-face services as their preferred method of communicating with the DVLA.

Concerns about turnaround times if processes are centralised in Swansea were expressed by over one-third of respondents in this category. Nearly one-fifth of respondents felt that this could impact on their ability to meet the demands of their own customers, leading to lost business. Related to the concerns about turnaround times, almost a quarter of Transport and Logistics respondents expressed concerns about delays in receiving tax discs posted from Swansea in the event of centralisation. One-fifth expressed concerns about the potential for mail and documents to go missing.

170 – “I would worry that having the process centralised and having to post applications/Tax discs would cause delays.”

Just under a third stated that they could not license their vehicles at a Post Office or online because of the type of vehicle involved. This could have been because of the Reduced Pollution and Plating Certificates required by heavy goods vehicles.

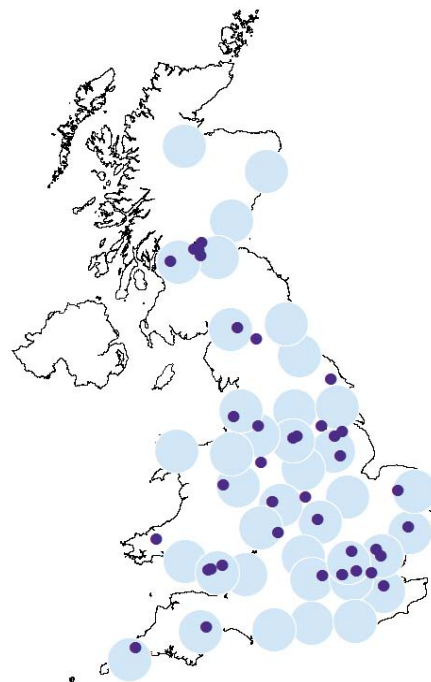
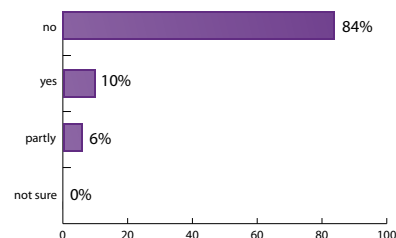
732 – “it is simple to go online and tax a private car, unfortunately with the complexity of commercial vehicles it is just not that straight forward.”

Over one-third of the respondents stated they value face-to-face services as their preferred method of communication. This was reinforced with just under one-third stating they have concerns over a reduction in user experience and lost added value if the offices were to close. It was also indicated that this group had strong trust in Local Office staff and their ability to deal with often complex transactions. This is demonstrated by 9% of respondents explicitly indicating that they wish to “Maintain status quo and leave Local Offices open”. Although this figure may seem low, this was an unprompted statement and not in response to a direct question.

412 – “some issues can only be resolved efficiently by face to face contact with a member of DVLA.”



Do you agree with the proposals?



Top ten points raised:

- 1 Value face-to-face
- 2 Concerns over the turnaround of documents
- 3 Concerns over electronic channels being unable to serve complex transactions but fine for more simple transactions
- 4 Concerns over user experience or lost added value
- 5 Welcome increased services from digital
- 6 Concerns that tax cannot be gained from Post Office or online because of the vehicle type
- 7 Pro electronic or are already a current electronic user
- 8 Mention that the delay obtaining a tax disc from centralisation will be an issue
- 9 Concerns that alternative channels will not be ready to replace the LO
- 10 Concerns over mail and documentation going missing

Of those respondents who indicated that they value face-to-face services, 42% also indicated that electronic services are unsuitable for complex transactions but acceptable for more simple ones.

The Transport and Logistics group were predominantly against the use of intermediaries with 15% against and 6% in favour. The remainder did not specify either way.

Only two respondents in this group stated they were against internet or electronic service channels.

Almost a quarter of this group said that they were in favour of internet or electronic transactions or were already a current user of them.

There is also evidence that there is a requirement for more online services. Just short of one-third of respondents stated they would welcome increased services through digital channels. Although concerns were expressed that the alternative service options will not be ready in time to ensure a fluent transition.

309 – “the Post office in our area cannot deal with large amounts of vehicles to tax at once....On a monthly basis this is around 270 per month.”

Main transactions that raised concern were:

- Licensing of specialised vehicles
- Tax disc delivery (awaiting it to arrive by post)
- Bulk licensing transactions
- Reduced Pollution Certificates

This group showed little concern about social impacts, with the exception of digital exclusion or computer literacy being highlighted by almost one-fifth of the group.

54 – “...most are not computer literate and require personal attention.”

Two Transport and Logistics companies expressed concern about job losses.

There were no responses that specifically mentioned any concerns over language being a barrier.

Over one-tenth of the respondents said that the proposals would mean that they would have concerns about having to travel further to conduct their business with the DVLA. However, it should be noted that it was a common misconception that the DVLA would be requiring the customer to travel to the central site in Swansea.

Fleets

The majority of this group were against the proposals in the consultation. The largest concern expressed was about the time taken to deliver a tax disc from the DVLA in Swansea. Despite a similar percentage saying that they would benefit from additional online services, it is interesting to note how this group differs from the Transport and Logistics group as the fleet companies' biggest concern is keeping the end user of the vehicle compliant, although the perceived or forced non-compliance does not feature highly in their concerns.

834 – [What would most benefit you?] “If tax renewals were actioned on line instantly and the Client did not have to display the tax disc in the vehicle.”

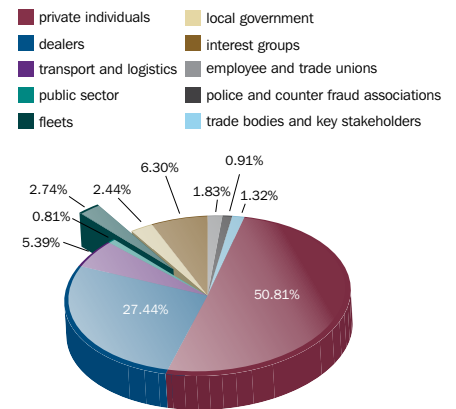
In addition to the concern about turnaround times, fleet companies also expressed concern that because some of them operate bespoke or specialist vehicles, there is no other alternative for them to obtain a tax disc.

249 – “As Hewden register construction plant equipment and the DVLA document requirement is that of machine weight the online system does not allow Hewden to tax, SORN or register online”

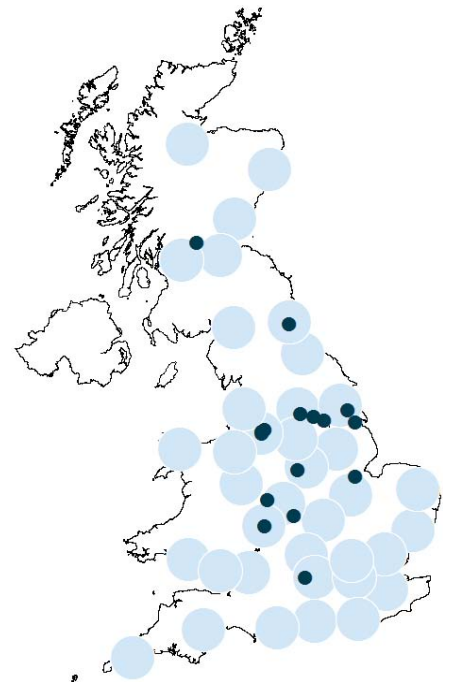
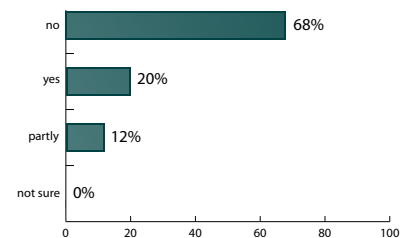
This in turn brings another issue about the perceived readiness of the DVLA to accommodate their needs by way of an electronic channel, even though well over half of this group are either a current user of such services or said they would like additional electronic services to be available.

A third of this group value the face-to-face contact. This is largely due to the need to have additional original documents checked, like Reduced Pollution Certificates or Plating Certificates. This group also draws attention to their need to be able to conduct bulk transactions as being a reason not to conduct their business online, further qualifying this by showing concern about the additional cost of transacting online.

6 – “As a medium sized fleet operator, currently around 130 lorries and 20 other vehicles, we have to tax a portion of our vehicles every month. Some months this may only be 5 or 6, but, on occasion, this could be as many as 12 – 15 lorries. To do this on-line we need a credit card with a £30,000 limit. Currently we can tax one vehicle at a time, each costing £2.50 for using the credit card. Potentially we would be paying over £30 a month just for using the on-line option, Any new system must enable us to batch process vehicles and pay only one transaction charge.”



Do you agree with the proposals?



Top ten points raised:

- 1** Mention that the delay obtaining a tax disc from centralisation will be an issue
- 2** Concerns over the turnaround of documents
- 3** Welcome increased services from digital
- 4** Concerns that tax cannot be gained from Post Office or online because of the vehicle type
- 5** Concerns that alternative channels will not be ready to replace the LO
- 6** Pro electronic or are already a current electronic user
- 7** Concerns with regards to the checking of original documentation
- 8** Mention of issues with the requirement to deal with bulk transactions
- 9** Value face-to-face
- 10** Welcome increased services from Intermediaries

As this group feel that their needs are very specialist and that some of them have access to DVLA systems now (eg Automated First Registration and Licensing), they suggest that they might be able to act as an intermediary providing DVLA services.

919 – Motability would prefer to operate our own intermediary service as a trusted partner of the DVLA.”

Nearly a third of this sector believes that the DVLA will become overburdened and that there is potential for poorer customer service. A similar number also said that there are already issues with accessing the DVLA through the Contact Centre.

645 – The DVLA could not cope with its 39 Offices closing; these offices are always full with your customers wishing to ask questions...”

A third of this group said that they would welcome increased services via intermediaries. Three respondents were concerned about having to pay extra costs to intermediaries but only one was concerned about the quality of staff that they would face via an intermediary.

Local government

Approximately half of respondents said that they either fully or partly supported the proposed changes.

The largest concern to this group was the value placed on face-to-face contact provided at the Local Offices, qualifying this by drawing attention to the knowledge and expertise of the Local Office staff and the “added value” this brings to the customer.

949 – “Opportunity for face to face resolution of enquiries is a must and should be even more accessible instead of closing off the one and only provision.”

The second largest concern of this group, with nine of the 24 respondents mentioning it, was the impact on the local economy. This focused not only on the impact on local motor traders but also other businesses that may benefit from the passing trade that the Local Office attracts.

226 – “The proposals would have a negative impact on the City as many people currently travel from across the county to use the DVLA office in Lincoln. A great number of the stop to shop in Lincoln, thus providing a welcome boost to our local businesses.”

Nine respondents suggested that they would welcome increased digital services. However, seven of these also felt that the alternative channels are not ready to replace the Local Offices, citing reasons such as their concern over the quality and security of potential intermediaries and the additional burden that will be placed on the DVLA’s headquarters in Swansea.

793 – “The fear is that the efficiencies and improvements as outlined in your proposals do not materialise and the impact is the service deteriorates. The DVLA currently does not have the resources and capability to provide the business user with an automated on line service and this is essential to meet the aims of the proposals”.

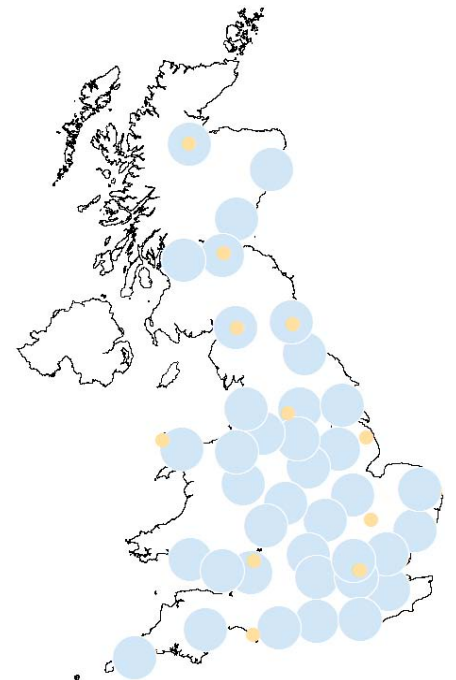
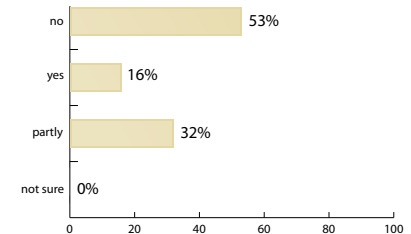
Another area where this group expressed strong views was about the potential for fraud or non-compliance.

629 – “Priority must be given to the security of the DVLA online system in order to prevent fraud”

There is also a concern about the effect the proposals may have on the local community; the suggestion being that there may be more unlicensed vehicles on the roads.



Do you agree with the proposals?



Top ten points raised:

- 1 Value face-to-face
- 2 Welcome increased services from digital
- 3 Concerns of the adverse effect on local economy and business
- 4 Concerns that alternative channels will not be ready to replace the LO
- 5 Concerned digitally excluded and computer illiterate people may be disadvantaged
- 6 Concerns over perceived forced non compliance/ fraud/law breaking
- 7 Possess a strong faith in Local Office staff's knowledge and ability.
- 8 Concerns of the local community around the Local Office
- 9 Pro electronic or are already a current electronic user
- 10 Concerns over the turnaround of documents

This group also felt strongly about the effect on society, with eight out of the 24 respondents mentioning digital exclusion. Many of the respondents mentioned their concern for potentially disadvantaged constituents and how they will be able to interact with the DVLA should the changes be adopted.

1000 – “Not everyone has, nor indeed wants, internet access and we all know how frustrating it can be making contact with a business or public body using the telephone”

Employee and trade unions

The employee group includes all those respondents who specifically identified themselves as an employee of either the DVLA or the DfT Shared Services Centre, which is also based in Swansea. It also includes the PCS Trade Union response.

There were 18 responses in this category. Of these, 15 did not agree with the proposals and the other 3 agreed in part.

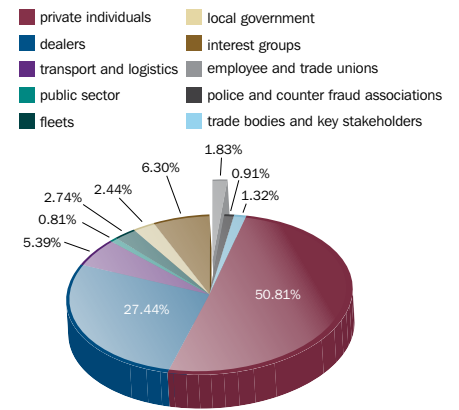
It is important to note that the tone of these responses, despite some obvious anxieties about their personal lives, are responsible, well articulated and demonstrate concern outside their immediate vicinity.

These are very comprehensive responses and clearly demonstrate that the respondents have a detailed knowledge of their customers and the services they require.

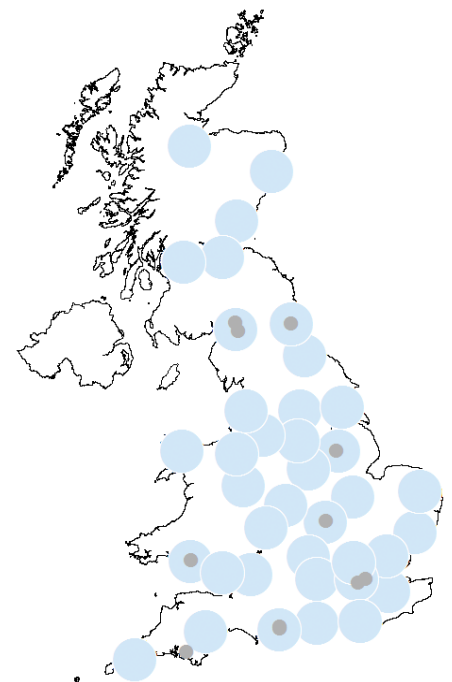
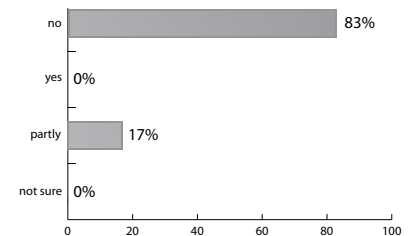
The reasons for this group not agreeing to the proposal in the consultation are very much focused on the needs of customers. While job losses are joint top of the concerns expressed, the remainder of the top ten are all concerns over service delivery or exclusion of certain customer groups.

The top concern from employees was that the DVLA's headquarters in Swansea would be overburdened with additional work and would not be able to cope with demand, leading to poor customer service. Several responses also drew attention to how Local Office staff 'clean' the mail before sending it to Swansea and warned that receiving the mail direct from the customers would create additional burden and more rejected applications.

892 – “There is no argument as to the chaos that will be created in the first few months and years after closure. The trade files, casework, AFRL records, Daily Office balances and all archived documents from all 39 offices will have to go to Swansea and be organised at the same time that 400 people are attempting to keep on top of the work of 1200. If the proposed date of 31/12/13 is to be the date, there will also be the renewal of trade licences and all that comes with that. Duplicate sets and surrenders adding additional time to the standard renewal applications”.



Do you agree with the proposals?



Top ten points raised:

- 1 Concerns that central DVLA will be overburdened and result in poor service
- 2 Concerns of unemployment
- 3 Value face-to-face
- 4 Concerns that alternative channels will not be ready to replace the LO
Concerns over mail and documentation going missing
- 6 Concerns over users experience or lost added value
- 7 Possess a strong faith in Local Office staff's knowledge and ability
- 8 Concerned digitally excluded and computer illiterate people may be disadvantaged
- 9 Concerns over quality or security of intermediary staff or services
- 10 Concerns about accuracy due to illiteracy and difficulty when completing application forms

The majority of respondents also recognised the value of face-to-face communication in order to deal with the nature of the enquiries they get. They also emphasised the value of the knowledge and expertise that had been built up in the Local Offices over the years. There was a feeling that this, combined with the added value offered by the Local Offices could not be replicated by an intermediary.

883 – “[The current intermediary]... makes too many mistakes now and is not vigilant/knowledgeable enough. So, so many traders are unaware they cannot use their trade insurance to tax a vehicle without registering the vehicle to themselves first. They often leave the Local Office with the comment “I’ll do it at the PO, they always tax my vehicles – no problem”.

Half of this group were concerned about the potential for items being lost in the post. This group are often contacted when someone has bought a tax disc online that has not been delivered, or if they have sent in a driving licence that has not been returned.

Six out of the 19 respondents in this group mentioned an issue with language barriers. Four out of the 19 thought that age or being slow to adopt technology would be an issue.

There was little concern from this group about the quality of the DVLA's alternative service channels, for example the information on the website or the Contact Centre, but where there was concern it was around the Integrated Voice Recognition telephone system and that the queries would be too complex and diverse to be dealt with by phone or online.

Staff find it difficult to see how the changes will be implemented in such a short space of time, whilst maintaining current levels of service to customers.

883 – “The question you would expect to hear from us as staff under threat of redundancy should be ‘What are WE going to do?’ However the question we hear every day when another point is raised is ‘What are THEY [DVLA Central] going to do?’”.

Trade bodies and key stakeholders

This group made up just 1% of the respondents and consists of large organisations and associations such as the Society of Motor Manufacturers and Traders (SMMT) and the Road Haulage Association (RHA). The responses were based on what they believe the perception of their members to be. Some of the organisations based their response on internal surveys they have conducted.

This group is made up of 12 responses. 5 agreed with the proposals, 5 partly agreed. 1 opposed the changes and 1 did not provide an answer.

The greatest concern from this group is that they do not believe that alternative channels are ready to replace the Local Office Network and the service they provide.

“791 – That too much reliance will be placed on interim measures, forcing all stakeholders to adopt short term emergency procedures before long term IT solutions can be implemented. The AFRL service has been out of step with customer’s requirements for some time and these changes will only increase the challenges to providing well structured, simple solutions.”

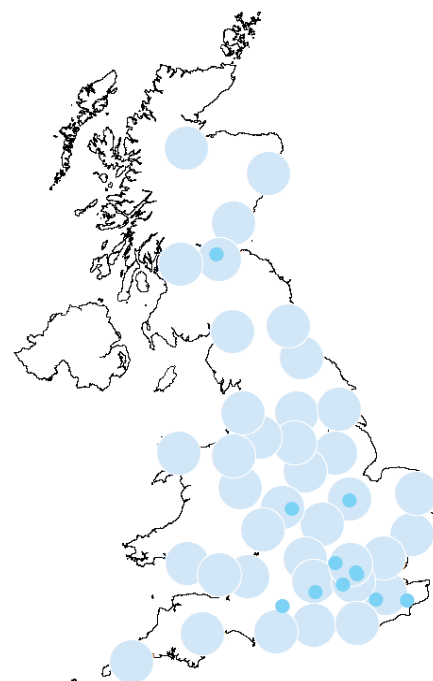
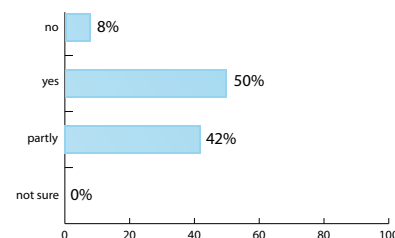
Two-thirds further qualify this by stating their main reason for this being potential delays in turnaround times resulting from centralisation. In addition one-third specifically cite delays in the turnaround for new registrations of imported or specialist vehicles. 54% of respondents have concerns about the degradation in the accuracy of processing documents and transactions.

“982 – A major concern would be the interim transfer of processes to the handled centrally by post, which from industry experience would present challenges for all customers, particularly through delays causing lost sales, data security, and accuracy of records, which could all suffer from any temporary process changes.”

Three-quarters of this group state that they feel they would benefit from additional online services or currently transact with the DVLA via electronic means. Another concern regarding the use of online services relates to security, with 38% of the group expressing this as a concern.



Do you agree with the proposals?



Top ten points raised:

- 1** Concerns that alternative channels will not be ready to replace the LO
- 2** Pro electronic or are already a current electronic user
- 3** Welcome increased services from digital
- 4** Concerns over the turnaround of documents
- 5** Concerns around accuracy and error handling
- 6** Concerns over quality or security of intermediary staff or services
- 7** Concerns over user experience or lost added value
- 8** Security concern towards digital services
- 9** Would welcome increased services through intermediaries
- 10** Concerns of time delays for new registrations/ imports/specialist/non AFRL transactions

“977 – The RHA [Road Haulage Association] believe all services relating to licensing and vehicles could be completed on-line subject to adequate security controls being in place.”

In terms of other channels only 38% of the group said they would welcome the use of intermediaries compared against the 54% that expressed a concern that any intermediary would not have sufficient knowledge or security in order to serve their needs.

791 – [concerns.] “That the guidance to intermediaries is comprehensive, clear and approved by the Trade Associations. The MCI experience significant problems with accuracy and consistency from local offices, that prove hard to resolve. With the transfer of transactions to Post Offices etc. There is concern that this situation would be magnified.”

977 – “Intermediaries would need to be highly trained and effective as they would be dealing with the more complex issues. They would also need to have the authority to make decisions. A greater move to using Post Office Counters would be ineffective without staff having the authority to complete the required transaction at the point of contact.”

Police and counter fraud associations

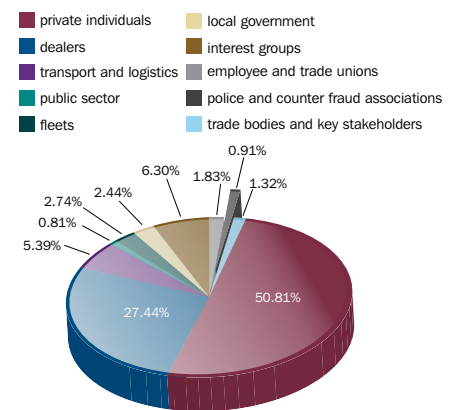
This group were split as to whether they were in agreement with the proposals or not as two out of nine said they supported the change, whereas three out of nine said they partly agreed, compared with four out of the nine who said that they didn't support the changes.

The largest concern from this group with seven out of nine respondents mentioning it was their concern about the loss of "added value" that the Local Office is able to provide, further qualifying this with six of the seven also citing that they have strong faith in the knowledge and expertise that the Local Office staff have.

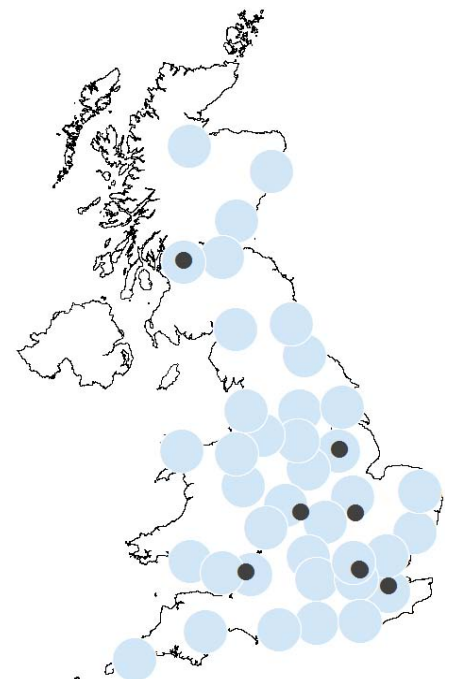
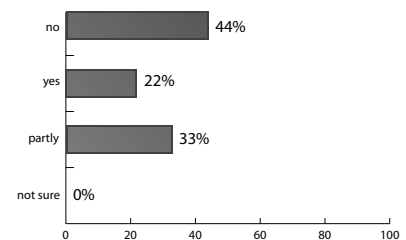
895 – *"The process of changing the identity of a stolen vehicle (so called cloning or ringing) in order to sell it on and realise its value is complex. To counter this crime type, staff must be highly skilled and well versed in the complicated procedures involved if systemic attacks and compromises are to be detected. These skills take many months, if not years to develop and it is important that skilled staff should not be lost if possible."*

The reason this group feel that the Local Offices are able to provide "added value" is in the security of vetting applications and with the assistance of crime detection and prevention.

895 – *"The current V62 procedure does currently allow for face-to-face assessments which, whilst not perfect, have proved successful in the detection and prevention of fraud. Removing this factor will, in our view, facilitate greater levels of criminal abuse. Reliance on electronic checks is demonstrably weaker than personal intervention and indeed can paradoxically enable crime. Opening up electronic gateways for consumers has afforded organised criminals the means by which criminals can produce forged documentation which contains a worryingly high degree of accurate data."*



Do you agree with the proposals?



Top ten points raised:

- 1 Concerns over user experience or lost added value
- 2 Possess a strong faith in Local Office staff's knowledge and ability
- 3 Security concern towards digital services
- 4 Concerns over perceived forced non compliance/ fraud/law breaking
- 5 Welcome increased services from digital
- 6 Pro electronic or are already a current electronic user
- 7 Value face-to-face
- 8 Concerns over electronic channels being unable to serve complex transactions but fine for more simple transactions
- 9 Concerns that alternative channels will not be ready to replace the LO
- 10 Concerns around accuracy and error handling

However, five of the nine respondents also state that they either currently use or would benefit from an increase in DVLA's electronic services.

622 – “The move to electronic data management instead of mainly paper is long over due. Hopefully it will enable vehicle records to be held electronically and therefore allow quick access to vehicle file histories?”

A third of this group are of the opinion that the alternative channels to replace the Local Offices are not ready and are therefore good for simple transactions but are unable to serve some of the more complicated issues that arise, particularly in the case of preventing and detecting crime.

29 – “Reg of new vehicles unable to be carried out electronically and would be posted to Swansea. Could quick turn-around be guarantee including duplicates required quickly.”

227 – “Cherished transfers electronically? The loopholes here without a vehicle exam are obvious. These mysterious barn-find vehicles that have been restored and want the plates off to be sold? Physical exams are essential otherwise people are getting number plates worth 10k for free.”

Public Sector

The Public Sector group are the smallest group to respond to the consultation. Two out of the total of eight respondents in this group did not agree with the proposed changes. Two answered Yes, Maybe or Partly and four did not state whether they were for or against the changes.

The main points raised by this group were that they welcome increased services by electronic means but have concerns about accuracy of the record. One response from the Justice Clerks' Society highlighted the importance that the DVLA database is able to fully interact with other electronic systems.

970 – “It is important to ensure that the DVLA database is able to fully interact with other government agency databases e.g. HMCTS Libra to ensure the accuracy and reliability of information stored.”

925 – “The option to update Keeper details online should support improved address data accuracy....”

A quarter say that they are already existing users of electronic services or welcome using the internet as a channel but are concerned over the use of intermediaries because of the quality and perceived security implications.

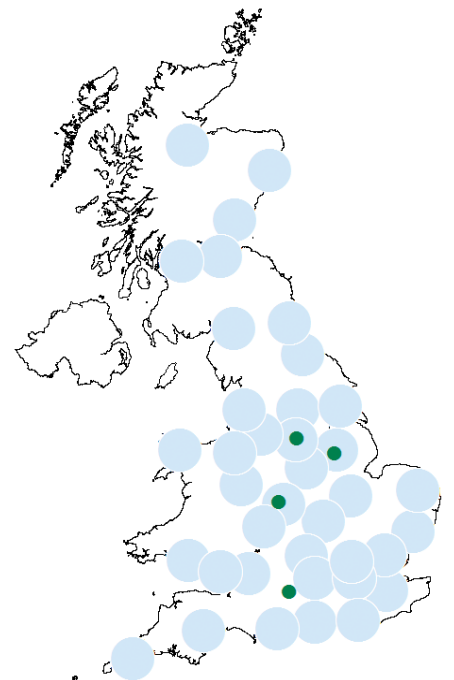
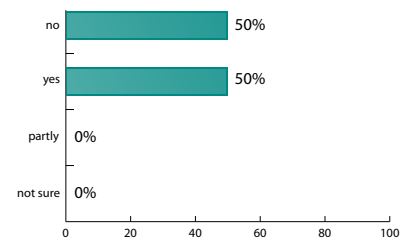
25 – “At the moment [I] am confident in the DVLA system in respect of its security and reliability, I would not be as comfortable with the operation if it was outside the DVLA umbrella.”

People in this group believe that alternative service channels will not be ready in the proposed timelines citing reasons such as the registration of specialist vehicles as complex transactions.

Other points raised by this small group were spread over a broad range of issues and considerations reflecting the diverse requirements of public sector respondents.



Do you agree with the proposals?



Top ten points raised:

- 1** Welcome increased services from digital
- 2** Concerns around accuracy and error handling
- 3** Possess a strong faith in Local Office staff's knowledge and ability
- 4** Pro electronic or are already a current electronic user
- 5** Security concern towards digital services
- 6** Concerns over time delay in dealing with specialist vehicles
- 7** Concerns that alternative channels will not be ready to replace the LO
- 8** Concerns over security and quality of intermediary staff

The remaining points raised were raised on an individual level where just one respondent mentioned a driver's range of points

Some in this group were concerned over administrative issues such as trade plate and AFRL administration, whilst others mentioned points relating to the ability to tax vehicles, one mentioning specifically bulk transactions and not being able to tax online or via the Post Office because of additional documentation being required.

39 – “Royal Mail has a fleet of 30K+ and we regularly use Sheffield DVLA Each month because of last minute MoT's and RPC Certification”