



Department of the
Environment
www.doeni.gov.uk



**DRIVER VEHICLE AND LICENSING
NORTHERN IRELAND**

**DRAFT EQUALITY IMPACT ASSESSMENT
ON PROCEDURES USED TO ISSUE
DRIVING LICENCES**

CONSULTATION DOCUMENT

OCTOBER 2005

CONTENTS

Page

1.	EXECUTIVE SUMMARY	1
1.1	INTRODUCTION	1
1.2	BACKGROUND TO DRIVER LICENSING.....	1
1.3	DRIVER LICENSING LEGISLATION	1
1.4	ASSESSING MEDICAL FITNESS	1
1.5	CONSIDERATION OF AVAILABLE DATA AND RESEARCH REGARDING DRIVER LICENSING.....	1
1.6	ASSESSMENT OF IMPACTS	2
1.7	FORMAL CONSULTATION ARRANGEMENTS.....	3
2.	INTRODUCTION AND BACKGROUND	4
2.1	INTRODUCTION	4
2.2	SECTION 75 OF THE NORTHERN IRELAND ACT (1998)	4
2.3	BACKGROUND TO DVLNI AND SECTION 75 OF THE NORTHERN IRELAND ACT (1998).....	5
2.4	ROLE OF DVLNI.....	5
2.5	STRUCTURE OF DOCUMENT.....	5
3.	POLICY CONTEXT.....	6
3.1	PURPOSE OF SECTION.....	6
3.2	BACKGROUND TO POLICY	6
3.3	AUTHORITY FOR ISSUING DRIVING LICENCES	6
3.4	SUMMARY OF POLICY	7
3.5	POLICY SCREENING.....	7
3.6	EQIA ASSESSMENT ON PROCEDURES USED TO ASSESS MEDICAL FITNESS TO DRIVE	8
4.	MAKING AN APPLICATION TO DVLNI FOR DRIVING LICENCE	10
4.1	PURPOSE OF SECTION.....	10
4.2	APPLYING FOR A LICENCE.....	10
4.3	ASSESSING ELIGIBILITY	13
4.4	MAPPING OF PROCEDURES USED TO ISSUE DRIVING LICENCES	13
5.	CONSIDERATION OF AVAILABLE DATA AND RESEARCH.....	15
5.1	INTRODUCTION	15
5.2	KEY DATA SOURCES	15
5.3	LIMITATIONS OF AVAILABLE DATA	15
5.4	SUMMARY	16
6.	ASSESSMENT OF IMPACTS.....	17
6.1	PURPOSE OF SECTION.....	17
6.2	GENERAL ASSESSMENT.....	17
6.3	AGE.....	19
6.4	DISABILITY	20
6.5	GENDER	21
6.6	RACE.....	21
6.7	MARITAL STATUS	22
6.8	PERSONS OF DIFFERENT RELIGIOUS BELIEF, POLITICAL OPINION, SEXUAL ORIENTATION AND PERSONS WITH DEPENDANTS AND THOSE WITHOUT.....	22
6.9	SUMMARY OF IMPACTS	22
7.	MITIGATION/ALTERNATIVES.....	25
7.1	PURPOSE OF SECTION.....	25
7.2	IDENTIFIED IMPACT.....	25
7.3	CURRENT ARRANGEMENTS WHICH AIM TO PROMOTE EQUALITY OF OPPORTUNITY	25

8.	FORMAL CONSULTATION PROCESS	27
8.1	PUBLICATION OF RESULTS OF THE EQUALITY IMPACT ASSESSMENT	27
8.2	MONITORING FOR FUTURE ADVERSE IMPACT AND PUBLICATION OF RESULTS OF MONITORING	28

APPENDIX I PRO FORMA FOR CONSULTATION RESPONSES

1. EXECUTIVE SUMMARY

1.1 Introduction

This consultation document presents the findings of a draft Equality Impact Assessment (EQIA) of Driver and Vehicle Licensing for Northern Ireland (DVLNI) procedures for issuing driving licences. DVLNI is committed to promoting equality of opportunity and wants to hear your views on how best this can be achieved as part of the formal consultation process.

1.2 Background to Driver Licensing

In Northern Ireland the Department of the Environment (DOE) is responsible under the Road Traffic (Northern Ireland) Order 1981 and its subsequent amendments for driver licensing.

1.3 Driver Licensing Legislation

Presently, before the Department will grant a driver's licence, the Department must be satisfied that the applicant meets legislative requirements regarding:

- age (16 for mopeds, and car licence for those in receipt of mobility allowance, and 18 and 21 for larger vehicles, such as lorries, dependent on their size);
- residential requirements; and
- applicants must not be disqualified from driving.

1.4 Assessing Medical Fitness

A separate EQIA on the procedures used to assess medical fitness to drive was carried out as this was felt to be a specific and discrete policy area. The EQIA found that there were no adverse impacts on any of the Nine Section 75 categories arising from these procedures.

1.5 Consideration of Available Data and Research regarding Driver Licensing

Quantitative and qualitative data, where available, was assessed in relation to all the Section 75 categories: between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation, between men and women generally, between persons with a disability and persons without, between persons with dependants and persons without.

1.6 Assessment of Impacts

Table 1.1 provides a summary of the key issues raised in the assessment of impacts.

Table 1.1
Summary of Assessment of Impacts

Religion	Data is not collected on the religious beliefs of driving licence applicants and there is no evidence of a differential impact on people of different religion.
Political Opinion	Data is not collected on the political opinions of driving licence applicants and there is no evidence of a differential impact on people of different political opinion.
Race¹	There is evidence that the policy has an adverse impact on people from minority ethnic backgrounds, particularly asylum seekers, who may find it more difficult to meet the requirements for identification than others. Options for mitigating this impact are explored in Section 7 of this report. Views are welcomed on this issue.
Gender	A slightly lower proportion of women obtained licences than would be expected from their proportion in the population although there is no evidence of any adverse impact on women. Views are welcomed on this issue.
Age	<p>People below the age of 17 cannot obtain a driver licence (unless they are age 16 and in receipt of mobility allowance). Those aged below 16 cannot obtain a licence to drive tractors or mopeds. The age limits are in line with those in GB and are based on evidence that younger drivers are more likely to be involved in car accidents and are therefore justifiable in safety terms.</p> <p>Drivers aged 16 and in receipt of the higher rate of Disability Living Allowance are eligible for a driver licence as it is recognised that this group has different needs in relation to the policy and therefore represents a positive impact on equality of opportunity for this group.</p> <p>People aged over 70 receive free driving licences which is a positive impact on equality of opportunity for this group.</p>
Marital Status	Data is not collected on the marital status of driving licence applicants. There is evidence that women who are recently married or divorced are more likely to be required to demonstrate additional proof of identity, where their name is now different from that on their identifying documentation. This makes it a requirement that applicants have to obtain new identifying information in their 'new' name. While there is no evidence of any adverse impact on this group, views are welcomed.

¹ DVLNI is to undertake an Equality Impact Assessment on the issuing of driving licences and this assessment will focus on both race and age.

Sexual Orientation	Data is not collected on the sexual orientation of driving licence applicants and there is no evidence of a differential impact arising from the policy on people of different sexual orientations.
Dependants	Data is not collected on whether or not applicants have or do not have dependants and there is no evidence of a differential impact arising from the policy on people with or without dependants.
Disability	<p>The arrangements for assessing medical fitness to drive were the subject of a previous EQIA and are therefore not considered within this EQIA.</p> <p>There is evidence of higher satisfaction rates among people with disabilities than average.</p> <p>The arrangements for allowing 16 year old drivers in receipt of mobility allowance to obtain a driving licence represent a positive impact on equality of opportunity for this group.</p>

1.7 Formal Consultation Arrangements

Responses are welcome from consultees on the issues raised in this document. We are particularly seeking consultation responses to the issues highlighted above, however all responses are welcome and will be fully considered. A *pro forma* is available at the back of this document for ease of response. Responses can be made using any of the methods listed in Table 1.2 below. The formal consultation period will run until 31st January 2006 and all responses should be received by this date.

Table 1.2
Arrangements for Consultation Responses

Post	Mr Ken Wooster, DVLNI, Driver Licensing Division County Hall, Castlerock Road Coleraine, BT51 3TB
E-mail	dlconsultation.dvlni@doeni.gov.uk
Telephone	(028) 70325755
Fax	(028) 7034 1366
Text Phone	(028) 7034 1380

2. INTRODUCTION AND BACKGROUND

2.1 Introduction

This report details the findings to date of an equality impact assessment (EQIA) of the Driver and Vehicle Licensing Agency for Northern Ireland (DVLNI) procedures for issuing driver licences and presents options for consideration by DVLNI to further promote equality of opportunity and good relations. This assessment has been carried out in accordance with the guidance set down by the Equality Commission in their “*Practical Guidance on Equality Impact Assessment*”.

2.2 Section 75 of the Northern Ireland Act (1998)

Section 75 of the Northern Ireland Act (1998) requires public authorities in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

In addition, without prejudice to the above obligations, a public authority must also, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group.

The Northern Ireland Act (1998) requires public authorities to conduct an EQIA where a proposed policy is likely to have a differential impact on equality of opportunity. The purpose of this assessment is to identify those categories for whom the procedures may have a differential impact, the extent of this and whether this can be justified in policy terms.

2.3 Background to DVLNI and Section 75 of the Northern Ireland Act (1998)

For the purpose of Section 75 of the Northern Ireland Act, the functions exercised by DVLNI are regarded as functions of DoE and covered within the DoE Equality Scheme. This sets out how arrangements for complying with Section 75 obligations will be fulfilled. The DoE Equality Scheme was approved by the Equality Commission on 8th February 2001 and contained a commitment to carry out an Equality Impact Assessment on the Procedures for Issuing Driving Licences.

2.4 Role of DVLNI

DVLNI has the same responsibility for licensing drivers, registering and licensing vehicles and collecting and enforcing vehicle excise duty (motor tax) as the Driver Vehicle Licensing Agency (DVLA) in Great Britain. DVLNI is also responsible for the licensing of vehicle operators in Northern Ireland. DVLNI operates from headquarters in Coleraine and has nine local offices throughout Northern Ireland.

The mission of DVLNI is:

“to assist law enforcement, provide customer-focused services and collect taxes fairly and efficiently and promote road safety”.

The Agency’s principal objectives as set out in the 2003-2006 Corporate Plan are:

- to have an accurate database in order to issue correct documents and assist law enforcement, with a particular emphasis on road safety;
- to maximise the collection of Vehicle Excise Duty;
- to maximise the use of technology to support business and customer needs and deliver on government targets; and
- to consult and understand the needs of customers and representative groups in order to provide an innovative effective customer-focused service.

2.5 Structure of Document

The remainder of this document is set out as follows:

Section 3: Policy Context;

Section 4: Making an Application to DVLNI for Driving Licence;

Section 5: Consideration of Available Data and Research;

Section 6: Assessment of Impacts;

Section 7: Mitigation/Alternatives; and

Section 8: Formal Consultation Process.

3. POLICY CONTEXT

3.1 Purpose of Section

This section sets out the policy and legislative context governing the issuing of driving licences and details the operation of the policy.

3.2 Background to Policy

DoE has statutory responsibility to ensure that all licence holders are fit to drive and DVLNI, on behalf of DoE, is legally responsible for the issuing of driving licences and deciding if a person is eligible to hold a Northern Ireland driving licence.

In addition to NI legislation, driver licensing is also regulated by European Commission Directives. Driver licensing has been subject to EC Directive 80/1263/EEC and EC 91/439/EEC. Both Directives have attempted to harmonise driving licences across member states. The current driving licence policy in Northern Ireland conforms to the second Directive and a new directive is currently at the proposal stage and is expected to be implemented in 2007 or 2008.

3.3 Authority for Issuing Driving Licences

The legal basis for issuing driving licences lies in the Road Traffic (NI) Order 1981, as amended by the Road Traffic (Amendment) (NI) Order 1991, the Road Traffic (NI) Order 1995² and subsequent regulations including, in particular, the Motor Vehicle (Driving Licences) (Northern Ireland) Regulations 1996³. This legislation has been amended extensively and is expected to be consolidated in 2006.

² This is due to be revised further upon introduction of the Road Traffic (NI) Order 2006.

³ This legislation is based on the GB Road Traffic Act 1988 and the Motor Vehicles (Driving Licences) Regulations 1996.

3.4 Summary of Policy

Table 3.1 summarises the key policy issues in relation to examining the procedures used by DVLNI to issue driving licences.

Table 3.1

Summary of Policy

<p>1. What is the policy?</p> <p>Issuing of Drivers Licences in Northern Ireland</p>	<p>6. How do these outcomes meet or hinder other policies, values or objectives of the public authority or of Government?</p> <p>Fully compliant with Departmental objectives of ensuring road safety</p>
<p>2. What is the aim, objective and purpose of the policy?</p> <p>Ensuring road safety and the proper registration of drivers.</p>	<p>7. What factors/forces could contribute/detract from the outcomes?</p> <p>Contribute –none identified.</p> <p>Detract –none identified.</p>
<p>3. Who implements the policy?</p> <p>DVLNI is responsible for the implementation of driver licensing policy on behalf of the DoE.</p>	<p>8. How does the public authority interface with other bodies in relation to the implementation of this policy?</p> <p>DVLNI implements the policy on behalf of DoE.</p> <p>Driver Vehicle Testing Agency (DVTA) has responsibility for carrying out Driver Theory Tests and Practical Driver Tests which are required by DVLNI prior to a full Drivers Licence being issued.</p>
<p>4. What outcomes do we want to achieve with the policy? For whom?</p> <p>Improved road safety (for all). Efficient service delivery (for all applicants). Equal and fair treatment (for all applicants).</p>	<p>9. Are there any groups that might be expected to benefit from the intended outcomes but which do not?</p> <p>No.</p>
<p>5. Who are the main stakeholders in relation to this policy?</p> <p>General Public (particularly Road Users); Licence Holders; and the DoE</p>	

Source: DVLNI

3.5 Policy Screening

A decision was made to carry out an EQIA on the policy for issuing driving licences following a screening assessment which considered the following questions:

- is there any evidence of higher or lower participation or uptake within any of the nine equality categories?

- is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular main policy area?
- is there an opportunity to promote equality of opportunity or good relations by altering policy or working with others in Government or the community at large? and
- have consultations with relevant groups, organisations, or individuals indicated that particular policies create problems that are specific to them?

The Equality Scheme and subsequent consultation identified that an EQIA was required as there was evidence that people of different racial backgrounds, people with disabilities and people of different ages had different experiences and needs in relation to the policy.

3.6 EQIA Assessment on Procedures Used to Assess Medical Fitness to Drive

A separate EQIA on the procedures used to assess medical fitness to drive was carried out as this was felt to be a specific and discrete policy area. The EQIA found that there were no adverse impacts on any of the nine Section 75 categories arising from these procedures.

As a result of the EQIA, DVLNI undertook to further promote equality of opportunity by:

- developing a new Equality Working Group by 31st May 2003 tasked with ensuring DVLNI routinely considers the equality implications of its policies and procedures across all Section 75 categories;
- over the medium term, conducting tailored surveys and focus group research with those applicants declaring a medical condition and with disabled drivers to ensure that the processes continue to afford equality of opportunity; and
- giving consideration to collecting information relating to Section 75 categories in the forthcoming project to procure a new Driver Licensing Computer System, that is expected to be in place by 2008.

Further information or copies of the completed EQIA on the procedures used to assess medical fitness to drive are available from the publications section of the DVLNI website (www.dvlni.gov.uk) or from:

Mr S McLean,
Director of Corporate Services
Room 114
DVLNI
County Hall
Castlerock
BT51 3HS
Tel: 028 70341368
Text phone: (028) 7034 1380
Fax 028 70341424

This EQIA does not therefore assess the procedures used to assess medical fitness to drive as these have been considered in a previous assessment.

4. MAKING AN APPLICATION TO DVLNI FOR DRIVING LICENCE

4.1 Purpose of Section

The purpose of this section is to detail:

- the licence application procedure;
- the procedures used to assess eligibility for a driving licence; and
- the procedures for issuing a driving licence.

4.2 Applying for a Licence

Any person wishing to make an application for a licence must complete an application form (DL1) or a renewal form (DL1R) which is available from post offices, local vehicle licensing offices or directly from DVLNI by telephone. The application form requests standard information from applicants including:

- personal details;
- standard of eyesight and hearing;
- organ donation (voluntary section);
- the type of licence required;
- confirmation of identity;
- certifying of photograph;
- details of any convictions; and
- details of applicant's health.

In addition to completing the application form a number of items of documentation are required. These are detailed in Table 4.1.

Table 4.1

Documents Required to be Submitted with Driving Licence Application

Section	Purpose	Document(s) Required
1	Confirm identity	<p>One of :</p> <ul style="list-style-type: none"> ■ Full Valid Current Passport; ■ Birth Certificate; ■ Certificate of Registry of Birth (Provided your name is present on the certificate); ■ Adoption certificate; ■ ID Card issued by a member state of the EC/EEA (ID cards issued by the United Kingdom Passport Agency are not accepted by DVLNI as confirmation of identity); ■ Travel Documents issued by the Home Office; or ■ Certificate of Naturalisation or Registration.
2	Licence Photograph (and to confirm identity)	<p>A passport size photograph, which meets the following criteria:</p> <ul style="list-style-type: none"> ■ in colour ■ is a recent and true likeness, showing the full face, with no hat, helmet or sunglasses; and ■ is taken against a plain, evenly lit and light background; and ■ if a full valid united kingdom passport is sent with the application (in Section 1) then there are no further requirements in relation to the photograph and Section 6 of your application may be left blank.. In all other cases the photograph must either : <ul style="list-style-type: none"> - be signed on the reverse and Section 6 on the application form must be completed by one of the following (providing they are not a relative and have known you for at least two years): <ul style="list-style-type: none"> ● an MP; ● a Magistrate; ● a Minister of Religion;

Table 4.1

Documents Required to be Submitted with Driving Licence Application (cont'd)

		<ul style="list-style-type: none"> • a professionally qualified person (e.g. engineer, lawyer, teacher etc); • a local councillor; • a bank official; • an established civil servant; • a police officer; or • someone of similar standing; or <p>- your form including photograph and fee must be brought in person be checked at one of the five local vehicle licensing offices, offering this service (Belfast, Ballymena, Enniskillen, Downpatrick and Londonderry).</p>
3	If the name on document in Section 1 is different from name now a further document is needed to confirm the change of name.	<p>Example of documents that will fit this purpose include:</p> <ul style="list-style-type: none"> ■ Marriage Certificate; ■ Decree Absolute; ■ Decree Nisi papers; ■ Deed Poll; or ■ Statutory Declaration.
4	Application Fee	A cheque or postal order made payable to DVLNI for £38.00 for a first provisional licence or £19.00 for renewal of a full driver licence. Licences for those aged 70+ are free.
5	Test Pass	If you are upgrading your provisional licence to a full licence you must apply within two years of sitting your test and include a copy of your test certificate.

Source: DVLNI

4.3 Assessing Eligibility

In order to be eligible for a Northern Ireland licence an applicant must:

- be aged at least 17⁴ (16 to drive mopeds and a car licence may be issued to people aged 16 in receipt of mobility allowance, and 18 and 21 for larger vehicles, such as lorries, dependent on their size);
- be normally resident in Northern Ireland (if an applicant has moved from another country to the UK, a full licence cannot be issued until they have lived in the UK for six months in the 12 months before application); and
- not be disqualified from driving.

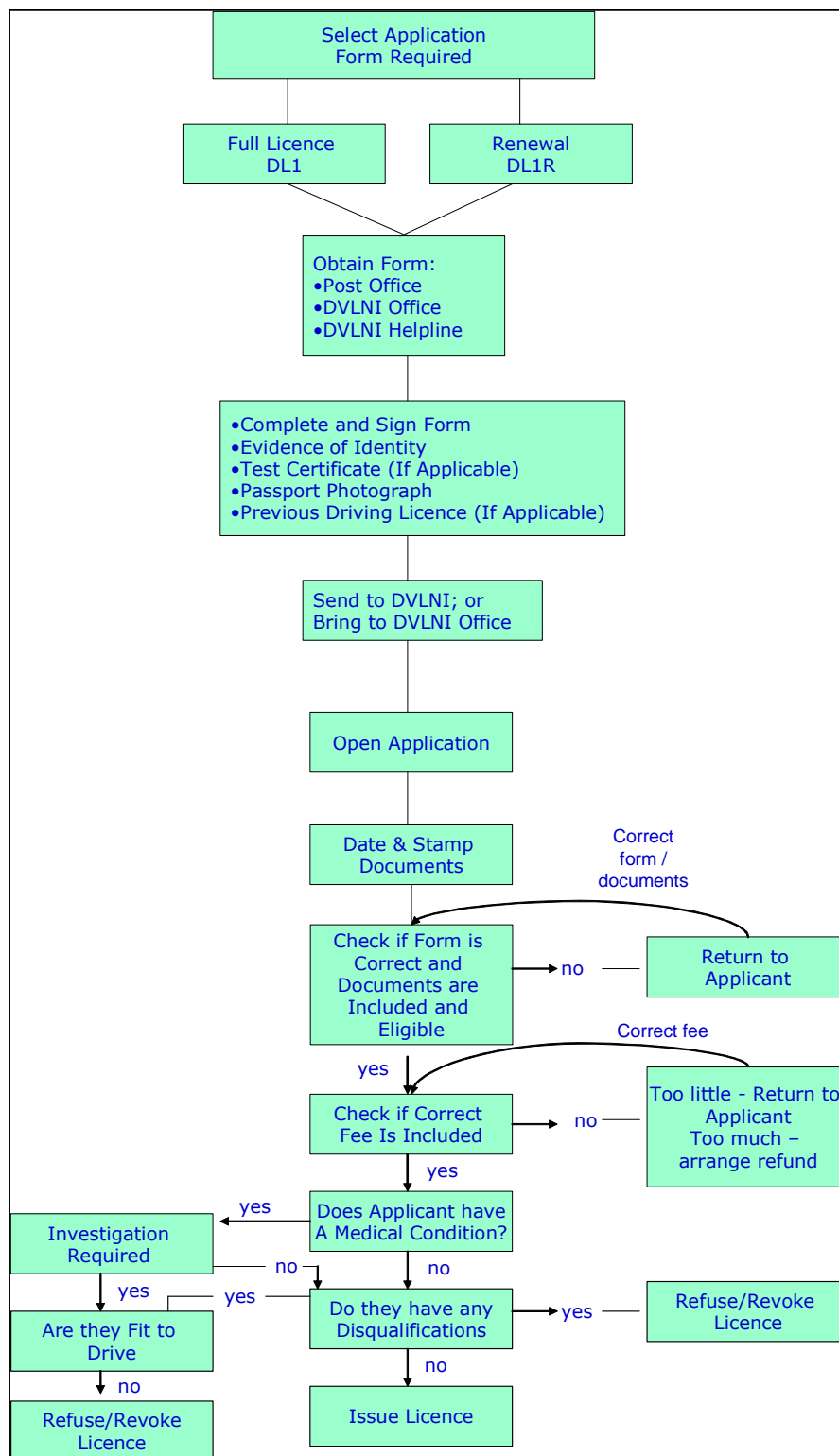
The documents detailed in Table 4.1 and DVLNI databases are used to verify that applicants meet these requirements.

4.4 Mapping of Procedures Used to Issue Driving Licences

Figure 4.1 overleaf details the DVLNI procedures used to issue driving licences.

⁴ An application for a provisional licence can be processed up to two months before an applicants 17th birthday.

Figure 4.1
Procedure Used to Issue Driving Licences by DVLNI



Source: DVLNI

5. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

5.1 Introduction

The purpose of this section is to:

- identify key data sources; and
- comment on the limitations of available data.

5.2 Key Data Sources

This EQIA was informed by data and research findings from the following sources:

- DVLNI licences issued from 2001-2003 by gender and age;
- DVLNI Customer Satisfaction Surveys (2000, 2001 and 2002);
- qualitative interviews with NICEM and Disability Action;
- feedback to the DoE consultation on the Equality Scheme;
- statistics from Department for Transport (DfT) on youth accidents; and
- complainant data.

The DVLNI computer database is not able to provide information on licence applied for by any Section 75 category, and information on applications actually issued is only available by gender and age, which restricts the scope for quantitative analysis.

DVLNI are aware of the limitations of the current database and arrangements for collecting Section 75 monitoring information will be considered in the development of any new DVLNI information database.

5.3 Limitations of Available Data

This section details the limitations of the data and information used to carry out this equality impact assessment.

5.3.1 Quantitative Data

Quantitative data is available from the application process for age, gender and disability Section 75 categories.

There is no quantitative data available with regard to religion, political opinion, race, marital status, sexual orientation and persons with dependents and those without.

5.3.2 Qualitative Data

Letters were issued to representatives of Section 75 groups, inviting them to identify if there were any issues in relation to the policy for Section 75 Group(s). Representatives of the following groups were contacted:

- Youth Council for Northern Ireland;
- Northern Ireland Council for Ethnic Minorities;
- Royal National Institute for Deaf People;
- Help the Aged;
- Equality Commission for Northern Ireland;
- Royal Society for the Prevention of Accidents;
- Travellers Movement NI; and
- Disability Action; and Age Concern.

A response was received from the Equality Commission which indicated that they did not feel there were any issues in relation to this policy. No other responses were received.

Telephone interviews were also carried out with representatives of the following agencies:

- Northern Ireland Council on Ethnic Minorities; and
- Disability Action.

The information gathered as a result of these interviews has been incorporated into the assessment of impacts.

5.4 Summary

The data and research detailed in this section is used as the basis for the assessment of impacts in Section 5.

Section 6, which details the options to mitigate potential adverse impacts will consider steps required to improve the quality of monitoring information available for future assessments.

6. ASSESSMENT OF IMPACTS

6.1 Purpose of Section

The purpose of this section of the assessment is to assess the impact of the policy on the nine Section 75 categories through reviewing relevant quantitative and qualitative findings.

6.2 General Assessment

This section draws on data held by DVLNI which is not broken down by Section 75 category to inform the EQIA.

6.2.1 Applications Processed

Table 6.1 details the applications processed by category by DVLNI between 2001 and 2003.

Table 6.1
Number of Licences Obtained by Category and Age (2001-2003)

	Full	Provisional	Medical	Total	Per cent	Per cent of NI 16+ population
16-24	71381	67776	564	139721	31	16
25-39	132343	14421	2256	149020	33	29
40-64	73767	5502	3895	83164	19	37
65+	70501	251	3878	74630	17	17
Total	347992	87950	10593	446535	100	

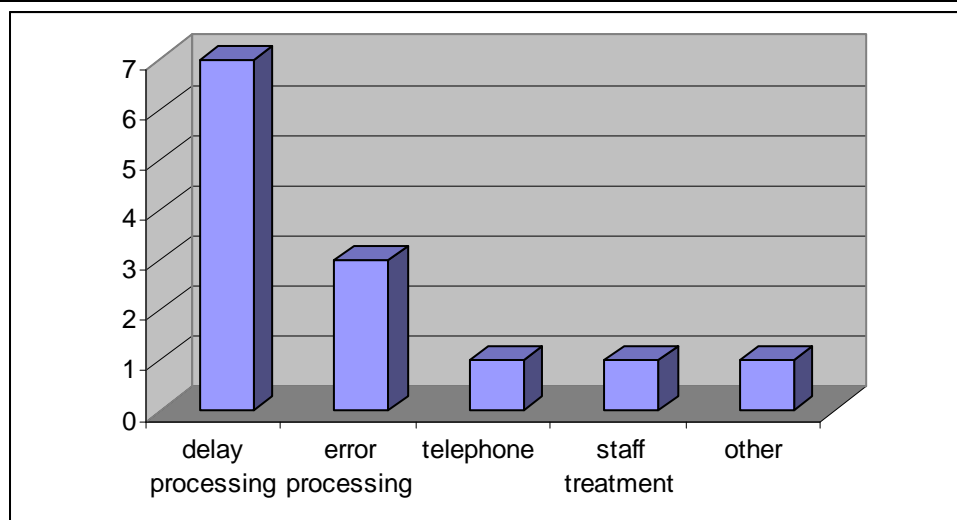
Source: DVLNI

There were 446,535 licences issued between 2001 and 2003. Of these, 77 per cent were full licence applications, 20 per cent were provisional licence applications and two per cent were medical licence applications.

6.2.2 Complaints and Compliments

From April 2003 – March 2004 thirteen complaints were received in relation to drivers licensing and Figure 6.2 illustrates the nature of complaints received.

Table 6.2
Complaints Received by Drivers Licensing Section (Apr 03-Mar 04)



Source: DVLNI

The vast majority (10) complaints related to delays in processing applications or errors in processing applications. None of the complaints recorded raised any issues specifically in relation to Section 75 categories. In addition to the above complaints, three compliments were received by DVLNI in the period, recording thanks and appreciation to staff in processing their applications.

6.2.3 Customer Survey

Twelve hundred copies of a postal survey were issued by Driver Licensing Branch on 5th April 2002 to people who had applied for licences in the past year. Three hundred and ninety eight surveys were returned, representing a response rate of 33 per cent. Recipients were asked how satisfied they were with the handling of their application overall. Table 6.3 illustrates the responses received.

Table 6.3
Satisfaction with Application Processing

Response	Number	Percent
Very Satisfied	236	59
Satisfied	143	36
Dissatisfied	12	3
Very Dissatisfied	7	2
Total	398	100

Source: DVLNI

Ninety-five per cent of all respondents were either satisfied or very satisfied with how their application was processed overall. Five per cent were not satisfied with how their application was processed (including two per cent of all respondents who were very dissatisfied).

Respondents were asked how satisfied they were with their telephone contact with Drivers Licensing overall. Table 6.4 illustrates the responses received from the 147 respondents that had telephone contact with DVLNI.

Table 6.4
Satisfaction with Telephone Contact

Response	Number	Percent
Very Satisfied	71	48.3
Satisfied	68	46.3
Dissatisfied	5	4.4
Very Dissatisfied	3	2.0
Total	147	100

Source: DVLNI

Ninety four per cent of those that had telephone contact with DVLNI were satisfied or very satisfied. Just six per cent of total respondents that had telephone contact with DVLNI were not satisfied (including two per cent of total respondents that were very dissatisfied with telephone contact).

6.3 Age

Table 6.1 illustrates the numbers of drivers licences obtained by people of different ages from 2001-2003.

Thirty-three per cent of licences over the three year period were issued to those between the age of 25 and 39 with a further 31 per cent issued to those between the ages of 16 and 24. Those aged between 40 and 64 accounted for 19 per cent of issued licences with the remaining 17 per cent going to those over the age of 65. In comparison 16 per cent of the NI 16+ population are aged 16-24, illustrating that a higher proportion of people in this age group obtain licences. A lower proportion of those aged 40-64 obtain licences (19 per cent) than the population average (37 per cent). Seventeen per cent of licences were obtained by those over the age of 65, in proportion with the numbers of this age group in the population.

The age restriction for acquiring a driving licence for a car is 17, and for a moped 16. People aged 16, in receipt of higher rate of Disability Living Allowance, can receive a driver licence from the age of 16. Feedback to the DoE consultation on the Equality Scheme noted this treatment of younger people in relation to applying for a driving licence. DVLNI cited statistics on the likelihood of younger drivers to have accidents, as supporting evidence for restricting the age of applications for a driving licence.

Sixteen Year Olds in Receipt of Mobility Allowance

Young people in receipt of higher rate of Disability Living Allowance are allowed to apply for a car licence aged 16, as it is recognised that mobility restrictions may increase the need for independent transport among this group.

Feedback from Disability Action suggests that the ability of disabled 16 year olds to receive a car licence is, in their view, a policy which promotes equality of opportunity for 16 year old disabled people.

DVLNI feel that in the interest of equality of opportunity for people with mobility restrictions that this is appropriate. Views on this matter, however, are welcomed through the consultation.

Minimum Ages for Other Vehicle Categories

The minimum age can vary dependent on vehicle categories. Category C1 (medium sized goods vehicles) has a minimum licensing age requirement of 18 years, whilst category C (large goods vehicles) has a minimum licensing age requirement of 21 years.

This age requirement is in line with GB standards and DVLNI feel this is appropriate. Views on this issue however are welcomed through the consultation.

6.4 Disability

The 2000 Customer Satisfaction survey undertaken by DVLNI asked respondents to state:

- whether they had a disability; and
- if they had declared a medical condition on the application form.

Out of a sample of 1000, 69 (seven per cent) declared that they had an unspecified disability and 118 (12 per cent) indicated that they had a medical condition. Fifty of the 69 (73 per cent) respondents with a disability said they had declared a medical condition to DVLNI. The findings of the survey revealed that:

- there were higher levels of satisfaction with DVLNI (very satisfied and satisfied) amongst those with a disability compared with all other applicants; and
- there were no significant differences between those with a disability and all others surveyed with respect to ease of completing the application form and the rating of application and renewal forms.

Of those with a disability, the majority 59 (86 per cent) indicated that any special needs they had were met by DVLNI.

As detailed above, the arrangements for assessing medical fitness to drive have been the subject of a separate EQIA and are therefore not considered within this report.

6.5 Gender

Table 6.5 illustrates the gender breakdown of those that applied for a driving licence from 2001-2003.

Table 6.5
Number of Licences obtained by People of Different Gender (2001-2003)

	Full	Provisional	Medical	Total
male	208970	46228	6761	261959
female	139022	41722	3832	184576
Total	347992	87950	10593	446535

Source: DVLNI

Fifty-nine per cent of all licences issued in the period were obtained by men with the remaining 41 per cent obtained by women. Women make up 49 per cent of the Northern Ireland population and therefore the proportion obtaining licences is slightly lower than would be expected.

6.6 Race

Feedback on the DoE consultation to the Equality Scheme indicated that the requirement to be resident in Northern Ireland six months prior to an application being issued could impact differentially on people from different racial groups. At the date of the last Northern Ireland Census (2001) there were 14,279 people of minority ethnic backgrounds living in Northern Ireland, representing 0.85 per cent of the Northern Ireland population.

No data is available from DVLNI on the racial backgrounds of people applying for and receiving driving licences.

The Northern Ireland Council for Ethnic Minorities (NICEM) are in contact with approximately 250 principal applicants seeking asylum. A number of issues in relation to driving licence applications which have impacted on people from different racial groups were raised through a telephone interview with a representative of NICEM. These are:

- the documentation required to verify ID is more difficult for asylum seekers to produce than other people because they will often not have original documents when they left their own countries or original documents may have been held by immigration authorities;
- while NICEM welcome the fact that travel documents issued by the Home Office can now be used as proof as identification, these will only be received by people where a determination has been made on whether or not they can stay. In one case they are involved in an asylum application has been ongoing for eight years;
- driving licences issued in the country of origin can only be used for one year in Northern Ireland. Such driving licences cannot be used as identification to procure a Northern Ireland driving licence;

- in the past DVLNI would meet with people who had difficulties in showing the required documentation and make a determination on a case by case basis. The new requirements impact negatively on people from minority ethnic backgrounds and asylum seekers;
- recognition of additional interpreting services by DVLNI and DVTA would expand the number of languages available and reduce costs for applicants. NICEM would like it noted that they have links with an interpreting service; and
- while NICEM note that there is a requirement to be resident in Northern Ireland 6 months before an application for driving licence can be made they feel that this is mitigated by allowing a driving licence from the country of origin to be used for up to one year.

The available research suggests that there is an adverse impact with regard to people from different racial backgrounds may have different needs and experiences in relation to this policy and this is considered further in Section 7. The consultation would particularly welcome views on this issue.

6.7 Marital Status

Evidence from DVLNI suggests that the requirement to produce extra documentation to verify a change of name in the documentation may be more likely to impact on married women and separated and divorced women as these are most likely to have changed their name. Although there is no evidence to indicate this impact is significant the consultation would welcome views on this issue.

6.8 Persons of Different Religious Belief, Political Opinion, Sexual Orientation and Persons with Dependants and Those Without

No adverse impacts have been identified with regard to these Section 75 categories in relation to the driver licensing policy. Views from consultees on the impact of the licensing process on these groups would be welcomed

6.9 Summary of Impacts

This section summarises the impacts found by this EQIA. These are detailed in Table 6.6 overleaf.

Table 6.6

Impact of DVLNI Driver Licensing Procedures

Category	Impact of DVLNI Driver Licensing Procedures
Religion	Data is not collected on the religious beliefs of driving licence applicants and there is no evidence of a differential impact on people of different religion.
Political Opinion	Data is not collected on the political opinion of driving licence applicants and there is no evidence of a differential impact on people of different political opinion.
Race⁵	There is evidence that the policy has an adverse impact on people from minority ethnic backgrounds, particularly asylum seekers, who may find it more difficult to meet the requirements for identification than others. Options for mitigating this impact are considered in Section 7 of this report.
Gender	A slightly lower proportion of women obtained licences than would be expected from their proportion in the population.
Age	<p>People below the age of 17 cannot obtain a driver licence (unless they are age 16 and in receipt of mobility allowance). Those aged below 16 cannot obtain a licence to drive tractors or mopeds. The age limits are in line with those in GB and are based on evidence that younger drivers are more likely to be involved in car accidents and are therefore justifiable in safety terms.</p> <p>Drivers aged 16 and in receipt of the higher rate of Disability Allowance are eligible for a driver licence as it is recognised that this group has different needs in relation to the policy and therefore represents a positive impact on equality of opportunity for this group.</p> <p>People aged over 70 receive free driving licences which is a positive impact on equality of opportunity for this group.</p>
Marital Status	Data is not collected on the marital status of driving licence applicants. There is evidence that women who are recently married or divorced are more likely to be required to demonstrate additional proof of identity, where their name is now different from that on their identifying documentation. This makes it a requirement that applicants have to obtain new identifying information in their 'new' name, although there is no evidence of any adverse impact on this group.
Sexual	Data is not collected on the sexual orientation of driving licence applicants and there is no evidence of a differential impact

⁵ DVLNI is to undertake an Equality Impact Assessment on the issuing of driving licences and this assessment will focus on both race and age.

Orientation	arising from the policy on people of different sexual orientations.
Dependants	Data is not collected on whether or not applicants have or do not have dependants and there is no evidence of a differential impact arising from the policy on people with or without dependants.
Disability	<p>The arrangements for assessing medical fitness to drive were the subject of a previous EQIA and are therefore not considered within this EQIA.</p> <p>There is evidence of higher satisfaction rates among people with disabilities than average.</p> <p>The arrangements for allowing 16 year old drivers in receipt of mobility allowance to obtain a driving licence represent a positive impact on equality of opportunity for this group.</p>

7. MITIGATION/ALTERNATIVES

7.1 Purpose of Section

This section is concerned with detailing measures that mitigate against any impacts identified and which might better achieve the promotion of equality of opportunity.

7.2 Identified Impact

This section considers the impact identified in Section 6

7.2.1 Race

There is evidence that people from minority ethnic backgrounds may have different needs in respect of this policy. They may find it more difficult than others to meet the requirements of the policy in respect of providing evidence of identity or other documentation. This is particularly true of asylum seekers.

It is recognised that there is a need to ensure that Driving Licences, which represent a main form of identification, are underpinned by a robust process for verifying identification of individuals. In order to mitigate against potential differential impact on people of different racial background DVLNI will give consideration to:

- whether there is an opportunity to accept alternative documentation (e.g. details of asylum application, driving licences from country of origin, Home Office papers) on a case by case basis where original documentation is not available; and
- whether there can be an opportunity to extend the length of time for which a non-Northern Ireland Driving Licence may be used (currently one year) on a case by case basis.

7.3 Current Arrangements which Aim to Promote Equality of Opportunity

This section details arrangements already put in place by DVLNI to promote equality of opportunity.

7.3.1 Accessibility

DVLNI operates a 24-hour, seven-day a week telephone Information Line (028 90250500) and assistance in completing application forms is available. The general public can also contact the Drivers Licensing Section of DVLNI on a Direct Dial Line (normal office hours) to enquire on the progress of applications.

DVLNI also have a network of eight offices which applicants can visit to have their identity verified in person by a DVLNI employee. This allows applicants to dispense with the need to have their photographs signed by an official.

DVLNI maintains an extensive website (www.dvlni.gov.uk) which includes guidance on applying for a driving licence.

8. FORMAL CONSULTATION PROCESS

The formal consultation period will last for twelve weeks and will close on 31st January 2006 and all responses should be received before that date.

Document can be made available in Braille, disc, audiocassette, large print and alternative language format on request. If there is any other way in which we can assist your participation in this consultation exercise please let us know.

Table 8.1

Communication Methods for Responses, Queries and Comments

Name	Mr Ken Wooster
Address	DVLNI Driver Licensing Division County Hall Castlerock Road Coleraine BT51 3TB
Tel	(028) 7032 5755
Fax	(028) 7034 1366
Text Phone	(028) 7034 1380
Email	dlconsultation.dvlni@doeni.gov.uk

A copy of this document will also be available in the publication sections on our websites at www.doeni.gov.uk and www.dvlni.gov.uk .

Final findings and associated changes in practice will be published within six months from the close of consultation.

8.1 Publication of Results of the Equality Impact Assessment

Following the 12 week consultation period, a decision will be made on the policy, taking into account the feedback from this period of formal consultation. All consultees will be advised of the results of the final EQIA and any changes to the policy made as a result.

8.2 Monitoring for Future Adverse Impact and Publication of Results of Monitoring

DVLNI are committed to investigating the most effective ways of monitoring for future impact. This could include asking specific questions in the DVLNI customer satisfaction survey of the impact of the driver licensing process on different Section 75 groups. The data arising from this survey will be complemented by ongoing monitoring and analysis of complainant data.

APPENDIX I

Pro Forma for Consultation Responses

DVLNI Driver Licensing - Consultation Pro forma (Optional)

As noted in the main document, we are particularly eager to get feedback on the following areas and have designed a pro-forma for you to complete. You do not have to use this proforma and can submit a written response in any other form.

Gender A slightly lower proportion of women obtained licences than would be expected from their proportion in the population. Whilst no evidence of the process having an adverse impact on women has been identified, we would be keen to get views on this matter.

Age Is the possibility of getting a licence for a car when 16 years old if in receipt of disability allowance reasonable?

Age Is the requirement that you need to be 18 or 21 years of age to get a licence for specified larger vehicles, reasonable, as compared to 17 years of age for a full driving licence for a car?
