



# **DRIVER & VEHICLE TESTING AGENCY**

## **ANALYSIS OF EXPIRED MOT CERTIFICATES**

### **SURVEY**

**Compliance Section**

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## **Key Results From The Survey**

- 80% of applications for tests were not made within the prescribed four weeks before the certificate is due to be renewed
- 71% of certificates were not renewed before the old certificate expired
- 51% of certificates were not renewed 14 days after the expiry date
- 33% of certificates were not renewed 28 days after the expiry dates
- 11% of certificates were not renewed 90 days after the renewal date
- The average number of days for all certificate renewals is 39 days after expiry date.
- The average number of days for renewal of late certificates is 59 days.
- Potential loss of revenue as a result of delays is £1.1m (gross).

(Information on the information gathered and the analysis undertaken is included in Appendices 1 to 10.)

# ANALYSIS OF EXPIRED MOT CERTIFICATES

## 1 INTRODUCTION

### Background

- 1.1 This survey was undertaken as part of the Agency's initiative to improve compliance with the MOT system. While it will form part of a broader compliance strategy the timing was influenced by the need to have factual evidence to support the proposal to introduce mandatory display of MOT discs.
- 1.2 The compliance strategy will address all areas of the Agency's responsibilities including vehicle testing, driver testing and the Approved Driving Instructor Scheme. It is intended that in setting targets and objectives to achieve change, a baseline of current levels of compliance will be established.
- 1.3 This is the first of three surveys to be undertaken in respect of vehicle testing. Its purpose is to establish the percentage of MOT certificates not renewed by the due date and in respect of those not renewed on time a breakdown of the number of days and weeks late. The next two surveys planned will include an investigation of the number of vehicles on public roads that are required to have a MOT certificate but do not and also the roadworthiness of vehicles being driven on public roads.
- 1.4 The terms of reference for this survey were agreed as "to carry out an analysis of DVTA records to determine current levels of compliance for renewal of test certificates."

## **2 APPROACH**

2.1 The survey was carried out in line with the approach as documented in the survey proposal. This included:

- initial consultation with Central Statistics and Research Branch, to confirm the validity of the methodology to be used and to determine the size and scope of the sample of records to be analysed;
- recording of data from application forms;
- spot checks to validate data collected;
- analysis and documentation of findings; and
- further consultation with Central Statistics and Research Branch to validate analysis.

## **3 OVERVIEW OF PROCESS FOR RENEWING MOT CERTIFICATE**

### **Process for obtaining MOT certificate**

3.1 The process for obtaining an MOT certificate involves the vehicle owner completing an application form (VT3) for the MOT test at least 28 days prior to expiry of the current test certificate.

3.2 An appointment date for the test can be made by the vehicle owner posting the completed application form to a DVTA Centre or by attending in person. In either case a date for the test is allocated and the vehicle owner advised.

3.3 The vehicle is tested at the date and time shown on the appointment card and must pass a range of criteria (the MOT test) as detailed in the application form. In cases where the vehicle fails any of the criteria the vehicle owner can request a retest appointment at which time the vehicle will be tested on the area(s) which it did not pass initially.

## **4 FACTFINDING AND ANALYSIS**

### **Information Available**

- 4.1 The Agency carries out some 400,000 tests each year on private cars. Application forms for all tests carried out in Northern Ireland are stored in the Armagh and Lisburn Test Centres. Records are stored according to the registration mark and the month in which the vehicle was tested. Lisburn holds the records for registration numbers 0 to 4,499 while Armagh holds those from 4,500 to 9,999. Both centres have their records sub-divided into a thirteen-month system whereby on a monthly basis the thirteenth month is securely destroyed. The records for each month are sub-divided into folders each containing fifty numbers i.e. all vehicles within the range 4,500 to 4,549 etc.
- 4.2 Advice from Central Statistics and Research Branch, DOE suggested that a sample size of 250 records from each centre would be required in order to provide a representative picture.

### **Capture of Data**

- 4.3 The records examined for this survey covered the period 11 August 2001 to 23 September 2002. In order to ensure that the sample taken was totally random, records were selected from all the shelves in each centre. As the records from all Test Centres across Northern Ireland are stored at Lisburn and Armagh the need to ensure that the survey reflected the picture across Northern Ireland was addressed.
- 4.4 A total of 505 records were collected; 14 of the records taken did not contain an MOT expiry date, but by cross- referencing with other computer records this was reduced to 13 records and these have not been included in any of the results. The overall size of the sample was therefore 492 records.

### **Issues to be taken into consideration**

- 4.5 In drawing conclusions from the results of this survey it should be noted that the information relates to those vehicle owners who presented their vehicles for the MOT test during the period covered by the survey. It is possible that there are vehicle owners who have avoided the test for a number of years or who should have renewed their certificate during the period covered but did not. It is also possible that some of the vehicles were off the road when the certificate expired and in such cases a certificate would not be required until the vehicle was being driven on the road again. While such circumstances may cover a number of vehicles it is unlikely to be significant in terms of the main results.
- 4.6 Management information on waiting times show that on average vehicles are tested within 23 days of application being made and where the certificate is due to expire within this period a test may well be arranged within a shorter period. In the past the need to have an application made the stipulated 28 days before the certificate was due to expire would have been regarded as sufficient if not excessive and vehicle owners who applied late would still in many cases get their certificates renewed on time. With higher demands on the Test Centres the waiting times across Northern Ireland have gone up and this is no longer the case. Nevertheless, in general those people who apply for the test 28 days before the expiry date will have their vehicles tested and a new certificate in place before expiry of their old one.

## **5 SURVEY RESULTS**

### **Applications not received on time**

- 5.1 Out of the total of 492 records examined, 394 applications had not been made 28 days before the expiry date of the previous certificate. (Appendix 1 Table and Appendix 7 Chart). This means that 80% of the applications analysed did not conform to the Agency MOT advice.
- 5.2 314 of the applications had not been made by the expiry date of the previous certificate representing 63.82% of the total.

### **Certificates not renewed on time**

- 5.3 The number of certificates not renewed before expiry of the previous certificate was 349, which is the equivalent of 70.93%.
- 5.4 The Table at Appendix 3 and the Chart at Appendix 9 show in detail the breakdown of the extent of delays in certificates being renewed.
- 5.5 The average number of days for all certificate renewals is 39 days after expiry date.
- 5.6 The average number of days for renewal of late certificates is 59 days.

### **Results in terms of total number of tests**

- 5.7 The results of the survey have been analysed to establish the position in respect of the total volume of tests undertaken by the Agency. On the basis that 71% of certificates are not renewed on time the actual number (71% of 400,000) would be 284,000. Apart from the implications for road safety and the environment each case represents a loss of revenue to the Agency. The average number of days for renewal of late certificates is 59 days; while the Agency will eventually receive the fee when the vehicle is tested, the lateness means that the Agency are losing out on potential revenue (see Table 1 below).

**Table 1 REVENUE LOST DUE TO LATE RENEWAL**

Cost of MOT Test	£25.00
Number of Cars Tested Per Year	400,000
Non Compliance Level at expiry date	71%
Non Compliance Level in Relation to number of Vehicles	284,000
Certificate Renewal of all certificates – average number of days	39 Days after expiry date
Certificate Renewal of late certificates – average number of days	59 Days after expiry date
Cost associated with late renewal per vehicle*	£4.041
Total Level of Potential Revenue lost per year**	284,000 x £4.041 = £1,147,644.00

Notes:

\* In order to calculate the possible revenue lost, it is assumed that the yearly MOT cost of £25 is divided by 365 to give a daily figure, this was then multiplied by the average number of days of certificate renewal of late certificates in order to provide a cost for each vehicle.

\*\* The figure provided for potential revenue lost is the gross revenue figure. The increased revenue shown would need to be offset by the increased variable costs associated with carrying out extra tests e.g. labour costs, fixed costs in order to calculate a net revenue total.

## **6 COMMENTS AND CONCLUSIONS**

### **Significance of Results**

- 6.1 A non-compliance level of 71% suggests that most vehicle owners do not take seriously the need to renew their MOT before their old one expires. This has a number of potential implications:

- Road Safety - A percentage of the vehicles which are non compliant will in all probability have defects which either a pre MOT service check or the MOT test itself might uncover. In a worst-case scenario these vehicles may cause a road collision.
- Environment - While non compliant vehicles are not being tested they could be emitting damaging fumes into the environment.
- Loss of Revenue - As indicated in the results section of this document the Agency is missing out on potential revenue.

6.2 This is the first survey on delays in renewing certifications so it is not possible to conclude how significant the results actually are in terms of the position getting better or worse. These results will provide a very useful baseline on which to analyse the impact of a number of new initiatives and they enable the Agency to commence a process where year on year change can be analysed.

6.3 It is also difficult to benchmark our results against other countries, as there is a lack of information available. The Republic of Ireland (ROI) now monitor performance in this area and it should be possible to compare results in future years.

6.4 A reason for non-compliance could be that people simply forget that their vehicle is due its MOT test and only realise that it needs an MOT when they receive a reminder from the tax office for their car tax. Others may deliberately allow slippage to delay the costs of the test and preparing their vehicle for the test. There may also be cases of serious evasions where vehicles owners avoid the MOT test, VED and insurance and do not maintain their vehicles in roadworthy condition. The lack of vehicle and owner identification in such cases can aid vehicle related crime.

6.5 As indicated earlier there are a number of initiatives that could have a potential effect on non-compliance figures. Some of these are

currently in the pipeline for implementation and others may provide suggestions for future initiatives.

### **Proposed Initiatives**

- 6.6 An MOT disc is being introduced as part of computerisation and the Agency is in the process of consultation on whether to make the display of the disc mandatory. The MOT disc should act as a visible reminder to vehicle owners that their vehicle is due its MOT.
- 6.7 The new booking system for MOT tests, presently being introduced by the Agency, includes provision for reminders to be sent to vehicle owners notifying them that their vehicle requires an MOT.
- 6.8 DVLNI are introducing Statutory Off-Road Notification (SORN), a scheme that will require each vehicle be licensed for road use or be the subject of a declaration that it will not be used on the road.

### **Potential Initiatives**

- 6.9 There are a number of initiatives that could be introduced to address the problem of late renewal. Some of these could be introduced fairly quickly while others would require a change in legislation. These include:
- following up reminder letters with telephone calls to let vehicle owners know that their vehicle test is due;
  - the use of a publicity campaign to convince people of the benefits of the MOT system;
  - a higher fee charged on a vehicle owner who without good reason did not renew the certificate on time;
  - a certificate issued could be restricted to the date on which it would have expired had it been issued at the date the previous certificate expired;
  - a variant of this could be that, as happens in the ROI, the test is always due on the date of manufacture; this means that there is no advantage to the vehicle owner who delays renewal of the certificate;

- the ROI has, on the statute book in, provision for imposing five penalty points for using a vehicle without a test certificate (12 points for disqualification) and a fine of €1,500.

6.10 The introduction of continuous registration for vehicle licensing is being considered by DVLNI to combat vehicle crime and abandonment of vehicles. This would strengthen procedures for vehicle registration and ensure that registered keepers of vehicles remain liable for them until proper notification of change of ownership has been completed. This is likely to have an impact on compliance with the MOT system.

## **7 THE NEXT STAGE**

7.1 The purpose of this survey is to determine the current levels of compliance in respect of the renewal of MOT test certificates. The results have been analysed in terms of the impact on the work of the Agency. The next stage is to determine what action needs to be taken to ensure improvement.

7.2 It is important that:

- targets are set for the future;
- information systems are developed to ensure that a survey can be undertaken each year to monitor improvement;
- that proposed initiatives are monitored; and
- if necessary, new initiatives are investigated.

### **Targets for Improvement**

7.3 In the Northern Ireland Road Safety Strategy 2002 – 2012, DVLNI has set a target of a 25% reduction in the evasion of PLG class vehicle excise duty (from 10% to 7.5%) by 2005.

7.4 In developing a target or targets for reducing the delay in renewing MOT certificates the following measures may be appropriate:

- % of certificates renewed by the expiry date (presently 29%)
- average number of days late in renewing (39 days)

7.5 The Agency may wish to consider adopting internal targets of 25% improvement across these measures for the period 2003 to 2005. This would mean that there would be parity with DVLNI's target in respect of VED evasion.

### **Systems to monitor improvement**

7.6 As part of the compliance strategy it is suggested that systems be developed to provide data each year on performance against these targets. Reports should be developed from information provided by the booking system and the MOT2 system as appropriate.

### **Review**

7.7 The introduction of computerisation over the next few years will mean that, instead of the need for a survey based on a statistical sample, the position in respect delays for vehicles tested will be available in the form of a management report. It may also be that information from other countries will be available for comparison. It is recommended, therefore, that the target be reviewed year on year to determine if it continues to be appropriate. The review should also consider the initiatives in place to determine if they are achieving the desired improvement or if potential initiatives need to be considered.

**APPENDIX 1**

***Breakdown of Applications Received***

**BEFORE EXPIRY**

<b>Timescale</b>	<b>Number of Applications Received</b>
78 – 84 Days	2
71 – 77 Days	2
64 – 70 Days	0
57 – 63 Days	1
50 – 56 Days	7
43 – 49 Days	18
36 – 42 Days	17
29 – 35 Days	42
22 – 28 Days	63
15 – 21 Days	62
8 – 14 Days	54
0 – 7 Days	46
1 – 7 Days	32
8 – 14 Days	25
15 – 21 Days	19
22 – 28 Days	10
29 – 35 Days	12
36 – 42 Days	5
43 – 49 Days	9
50 – 56 Days	6
57 – 63 Days	3
64 – 70 Days	5
71 – 77 Days	2
78 – 84 Days	1
85 – 91 Days	1
92 – 98 Days	4
99 – 105 Days	2
106 – 112 Days	1
113 – 119 Days	3
120 – 126 Days	0
127 – 133 Days	1
134 - 140 Days	4
141 – 147 Days	1
148 – 154 Days	1
155 – 161 Days	1
162 – 168 Days	0
> 169 Days	30

**AFTER EXPIRY**

**APPENDIX 2**

*Analysis of Application Dates in Relation to Expiry Dates*

		<b>Timescales</b>	<b>Applications Received (%)</b>
<b>BEFORE EXPIRY</b>		> 27 Days	19.9
		22 – 27 Days	10.98
		15 – 21 Days	12.6
		8 – 14 Days	10.98
		0 – 7 Days	9.34
		Expiry Date	
<b>AFTER EXPIRY</b>		1 – 7 Days	6.5
		8 – 14 Days	5.08
		15 – 21 Days	3.86
		22 – 28 Days	2.03
		29 – 56 Days	6.51
		57 – 84 Days	2.24
		>84 Days	9.94

**APPENDIX 3**

*Breakdown of Certificate renewal*

	<b>Timescale</b>	<b>Certificate Renewals</b>	<b>%</b>
<b>BEFORE EXPIRY</b>	>50 Days	1	0.20
	43 – 49 Days	1	0.20
	36 – 42 Days	2	0.40
	29 – 35 Days	1	0.20
	22 – 28 Days	12	2.44
	15 – 21 Days	14	2.85
	8 – 14 Days	21	4.27
	0 – 7 Days	91	18.5
	<b>1 – 7 Days</b>	52	10.57
	<b>8 – 14 Days</b>	48	9.76
	<b>15 – 21 Days</b>	47	9.55
	<b>22 – 28 Days</b>	39	7.93
	<b>29 – 35 Days</b>	32	6.50
	<b>36 – 42 Days</b>	18	3.66
	<b>43 – 49 Days</b>	12	2.44
	<b>50 – 56 Days</b>	11	2.24
	<b>AFTER EXPIRY</b>	<b>57 – 63 Days</b>	12
<b>64 – 70 Days</b>		6	1.22
<b>71 – 77 Days</b>		7	1.42
<b>78 – 84 Days</b>		7	1.42
<b>85 – 91 Days</b>		4	0.81
<b>92 – 98 Days</b>		1	0.20
<b>99 – 105 Days</b>		3	0.61
<b>106 – 112 Days</b>		3	0.61
<b>113 – 119 Days</b>		4	0.81
<b>120 – 126 Days</b>		0	0.00
<b>127 – 133 Days</b>		3	0.61
<b>134 - 140 Days</b>		3	0.61
<b>141 – 147 Days</b>		1	0.20
<b>148 – 154 Days</b>		1	0.20
<b>155 – 161 Days</b>		3	0.61
<b>162 – 168 Days</b>		1	0.20
<b>&gt; 169 Days</b>		31	6.30

*Analysis of Certificate Renewal*

	Timescales	Certificate Renewals (%)
	<b>BEFORE EXPIRY</b>	> 28 Days
22 – 28 Days		2.44
15 – 21 Days		2.85
8 – 14 Days		4.27
0 – 7 Days		18.5
Expiry Date		
<b>AFTER XPIRY</b>	1 – 7 Days	10.57
	8 – 14 Days	9.76
	15 – 21 Days	9.55
	22 – 28 Days	7.93
	29 – 56 Days	14.84
	57 – 84 Days	6.5
	>84 Days	11.77

## APPENDIX 5

### Extrapolation Using DVTA Tests (396,450 as per DVTA 02/03 Business plan)

<b>Timescales</b>	<b>Certificates Not Renewed (%)</b>	<b>Extrapolated Figure</b>
By Expiry Date	70.93	281,202
0 – 7 Days	60.36	239,297
8 – 14 Days	50.60	200,604
15 – 21Days	41.05	162,743
22 – 28Days	33.13	131,344
29 – 35 Days	26.62	105,535
36 – 42 Days	22.96	91,025
43 – 49 Days	20.52	81,352
50 – 56 Days	18.29	72,511
57 – 63 Days	15.85	62,837
64 – 70 Days	14.63	58,001
71 – 77 Days	13.21	52,371
78 – 84 Days	11.78	46,702
85 – 91 Days	10.97	43,491
92 – 98 Days	10.77	42,698
99 – 105 Days	10.16	40,279
106 – 112 Days	9.55	37,861
113 – 119 Days	8.73	34,610
120 – 126 Days	8.73	34,610
127 – 133 Days	8.13	32,231
134 - 140 Days	7.52	29,813
141 – 147 Days	7.31	28,980
148 – 154 Days	7.11	28,188
155 – 161 Days	6.50	25,769
162 – 168 Days	6.30	24,976

