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Driver & Vehicle Testing Agency

Equality Impact Assessment

Driving Theory Test

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Learner Driver Theory Test – Equality Impact Assessment

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1. Executive Summary

Introduction

- 1.1 This equality impact assessment, conducted by the Driver & Vehicle Testing Agency (DVTA) in 2001, considers the impact of the driving theory test on the relevant categories set out in Section 75 of the Northern Ireland Act. KPMG consulting assisted the Agency to comply with the Department of the Environment's (DOE) Equality Scheme.
- 1.2 The requirement for individuals to undertake a driving theory test is contained in the Driver Licensing Regulations (Northern Ireland) 1996.
- 1.3 Anyone wishing to drive unaccompanied on public roads must first pass a two-part theory test consisting of a multiple choice question section followed by a hazard perception test. The candidate must then pass a practical driving test.

Findings

- 1.4 As a result of this equality impact assessment, the Driver and Vehicle Testing Agency (DVTA) has determined that there is a differential negative impact upon:
 - People from ethnic minorities;
 - People with disabilities;
 - Women with dependants; and
 - People aged 25 and over.

Proposed Mitigation

- 1.5 The DVTA intends to take the following steps to mitigate these negative impacts:

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- Enhance awareness of the range of facilities available to assist all candidates taking their test. This will involve developing and circulating a fact sheet setting out what is available. The fact sheet will be targeted at representative groups, support groups, further education colleges and community groups. A copy of the leaflet will also be available on DVTA's web site. The Internet booking site will also be reviewed to present the full range of facilities to the candidate.

- Review and improve the telephone booking service. The objective will be to present candidates with the test options available without their having to request them and without referring to them as 'special' adaptations. This process will begin immediately and be developed through regular meetings with the test provider.

- The Belfast test centre has a booth to accommodate reader / recorder, deaf signer and translator assisted tests when other candidates are present in the test centre. The Agency will continue to accommodate candidates who wish to sit a translator assisted test at one of the other five centres through making test facilities available at a time convenient to the candidate but when no other candidates are present in the test centre. Translator costs at all centres are to remain the responsibility of the candidate.

- As a testing organisation, the DVTA has no mandate to supply or endorse learning materials for candidates wishing to take the driving theory test other than those developed by the Driving Standards Agency (DSA). This training material is available in a range of formats (books, CD-ROM and DVD) to provide as much flexibility in learning as possible. A full list of this material is available

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on the DSA website (www.dsa.gov.uk). The Agency will enhance awareness of these training materials by including information in future fact sheets and on the Internet booking site. DVTA will provide assistance to any group wishing to obtain a copyright licence to the theory test item bank to enable them to produce materials designed specifically to meet the needs of their members. A copyright licence can be obtained for each of the languages in which the theory test is available.

- Examine criteria for allocating extra time to candidates. Currently extra time to take the test is only made available in limited circumstances. It is proposed that an examination of the criteria against which extra time is allowed be undertaken to see if there is scope for making this facility more readily available. It is proposed that this review should be completed by September 2005.

1.6 Since the KMPG Consulting report on the driving theory test, DVTA has progressed a number of improvements benefiting Section 75 groups. These include:

- All theory test centres are now compliant with the requirements of the Disability Discrimination Act 1995.
- The number of language voiceovers available to Northern Ireland candidates has increased from four to twenty (includes English).
- Postal application forms now provide information of the full range of facilities available to assist them take their test.
- When a voiceover is not available an accommodation booth has been provided in the Belfast centre to facilitate

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translator assisted tests. This will allow greater flexibility to candidates requiring the use of the facility.

2.0 Background

2.1 Section 75 of the Northern Ireland Act 1998 requires all public authorities in carrying out their functions, 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.

2.2 In addition, without prejudice to the above obligations, DVTA must have regard to the desirability of promoting good relations between people of different beliefs, political opinion or racial group.

3.0 Policy Objective of the Theory Test

3.1 The Driver & Vehicle Testing Agency (DVTA) is the public authority with responsibility for the testing of drivers and vehicles in Northern Ireland.

3.2 Anyone who wants to drive unaccompanied on public roads in Northern Ireland must hold a full and valid driving licence. In order to obtain one of these they must:

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- Obtain a provisional licence from Driver and Vehicle Licensing Northern Ireland (having satisfied the authorities that they are fit to drive and legally entitled to do so);
 - Pass a driving theory test, administered by the DVTA, in order to prove that they are adequately familiar with the Highway Code, Northern Ireland driving regulations and driving conventions; and
 - Pass a practical driving test administered by the DVTA.
- 3.3 Different theory tests are applied to drivers depending on whether they wish to drive a car, motorcycle, lorry or bus. The theory test must be passed before a practical test can be booked. A theory test pass expires if the practical test is not passed in the subsequent two years.
- 3.4 The driving theory test was introduced on 1 July 1996. It was introduced as part of the second EC Directive on Driver Licensing, which brought the UK into line with other European Member States.
- 3.5 Before July 1996 questions on the Highway Code were asked as part of the practical driving test. However, whilst the practical test was a good test of driving ability, candidates could pass it without adequate preparation on all aspects of driving. Furthermore, the limited amount of time available during the practical test restricted the range of topics on which questions could be asked and made it unsuitable for dealing with more complex issues. The theory test was introduced, to ensure that new drivers had the knowledge and understanding that they needed about driving a vehicle to be safe on the road.

4.0 Overview of the Driving Theory Test

- 4.1 Around 40,000 people take the theory test each year. The test is delivered in six testing centres across Northern Ireland located in Belfast, Londonderry, Omagh, Ballymena, Portadown and Newry. Candidates can book the theory test by telephone, post, fax and by the Internet. The cost of sitting a theory test is £20.50.
- 4.2 From 4 January 2000 the multiple choice section of the theory test has been delivered to candidates using a computer “touch- screen” rather than by pen and paper. Candidates sit the test at screens located in individual cubicles and select their answers by touching the computer screen. The standard time allowed for the multiple choice section is 40 minutes and candidates must answer 30 out of 35 questions correctly in order to pass this part of the test.
- 4.3 In January 2003 a second component, the hazard perception test, was added. In this part of the test candidates are shown 14 video clips of different driving situations and asked to identify the developing hazards. The pass mark for car drivers and motorcyclists is 44 out of 75, for lorry and bus the pass mark is 50 out of 75.
- 4.4 Candidates must pass both parts of the test in order to obtain a theory test pass.
- 4.5 There are a number of facilities available to candidates who have special needs due either to a disability or to language / learning constraints. With the exception of the first point below these apply equally to both parts of the test.
- Candidates can apply to have longer than the standard time of 40 minutes to complete the multiple choice part

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of the test. The hazard perception test seeks to replicate conditions the candidate will actually encounter whilst driving, so the time element applied to this part of the test cannot be extended.

- The on-screen text for the driving theory test is English. Candidates who have difficulty reading the text on screen can, if they wish, request an English voice-over using headphones and the system will ‘read’ the questions and answers to them when they touch the relevant text on screen. All text on screen can be touched and ‘read’ as many times as the candidate wishes.
- In addition to the English voice-over support mentioned above, voice-over support is also available in 19 other languages. A list of these languages is available in Appendix D. For Car and Motorcycle tests, all languages currently offered are available for the theory part and the tutorial for the HPT element. The voiceover is not needed for the actual HPT element, as there is only a soundtrack and no spoken commentary. LGV and PCV tests are only available in English.
- If the candidate’s native language is not one of those supported with a voice-over an approved translator may assist the candidate in person. However, the candidate must inform the booking service that a translator is required when booking their test. The translator must be approved by DVTA. The cost of the translator is borne by the candidate.
- A video of the test in British Sign Language (BSL) is available on screen for candidates who are deaf or hard of hearing. A sign language interpreting service is available for candidates who cannot read BSL. The interpreter fee

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is paid by the Agency. Candidates who require such help must make a request when they book their test.

- One-to-one. A candidate can ask for a member of the theory test staff to sit with them during the test to read the questions and register the answers as directed by the candidate. Candidates who require such help must make a request when they book their test.
- If a candidate has a physical disability and is unable to press either the touch-screen or a mouse button, alternative input devices are available on request. Candidates who require such help must make a request when they book their test.
- A text phone number is available to candidates with hearing difficulties who wish to book their test by telephone.
- For the deaf, or those with other hearing difficulties, a loop system, or similar listening aid is available at all centres.

5.0 Data Collection and Consultation

5.1 Research was carried out in January and February 2001, and was made up of the following components:

- Use of existing DVTA/Theory Test contractor data;
- Interviews with test designers and delivery agents;
- Postal survey of recent test users (in both English and Cantonese);
- Telephone survey of voiceover users (in English);

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- Focus group of users for whom Cantonese was their first language;
- In-depth interviews with representative organisations for minority groups; and
- Upon completion of the information gathering, consultation with representative organisations for minority groups.

Key Informant Interviews

5.2 Key informant interviews were carried out with the following people and organisations:

- Theory Test contractor’s Northern Ireland area manager;
- Theory Test contractor’s test centre management and staff;
- Theory Test contractor’s call centre Northern Ireland team management;
- Equality Commission;
- Disablement Advisory Service, DEL; and
- China Unit, QUB.

5.3 The key informants provided extensive contextual information and qualitative observations on the delivery of the theory driving test and associated processes.

Postal Survey of Test Users

5.4 A postal survey of test users was carried out to generate social baseline information, results of which are contained in Appendix B.

5.5 The DVTA estimates an annual throughput of around 40,000 theory test users. In order to ensure statistical validity

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a sample of over 400 users was required. As the turnaround time for the survey was extremely short, especially as it was being conducted by post, the survey was issued to a relatively large population. The aim was for a response rate of 10% within two weeks of issue. The last 4000 people to have taken the test (across all testing centres, roughly equating to those who had taken the test in December 2000) were surveyed. Within the population of 4000, some 250 users were identified who had taken up the voice-over option (on-screen text listened to by the candidate through headphones). Telephone interviews were used to obtain a response from those that had used the voice-over in English (and would therefore potentially have difficulty in using the paper survey - 22 responses were obtained). The postal survey was translated into Cantonese and issued to those who had taken up the Cantonese voiceover option. Users in the sample took up no other language translation options.

- 5.6 An equality psychologist in conjunction with the Equality Commission designed the survey, and a copy is included as Appendix A. It draws out information on test success rates and social classifications, which were then cross-referenced along the lines necessitated by Section 75 of the NI Act.
- 5.7 It was decided to use “pass or fail first time” as the primary indicator in assessment of inequality. In cases where the number of respondents falling into a particular ‘equality grouping’ was very low the ‘number of times an individual had failed the test’ was used to augment the primary indicator. In these areas, quantitative data was also supplemented with qualitative information from the other aspects of the research methodology.
- 5.8 The percentage of people who passed the test first time (pass rate) across the entire survey sample was 63.6% and this is the baseline against which the first time pass rate for each

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‘equality grouping’ was compared. For further information please refer to Appendix B.

Survey Issues

5.9 There are several issues which were taken into consideration when analysing the survey results:

- No responses to the Cantonese-translated postal questionnaires were obtained (although a follow up to the postal survey by telephone was used to address this);
- The survey response did not include any transgendered people;
- Only 13 people with sexual orientation other than heterosexual responded;
- Only 6 people of ethnic groupings other than white responded.

However we have supplemented these low sample cell sizes by:

- a. Asking the Coalition on Sexual Orientation to raise any issues which its members had with the test; and
 - b. Setting up a focus group with Cantonese users (pre-December 2000).
- There were significant non-completion levels for some of the individual questions, particularly with regard to political opinion or affinity; and
 - The survey asked open questions with regard to political opinion and religion. The responses covered a wide

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variety of faiths and political doctrines, but the number of resultant survey cells made the vast majority of the data statistically insignificant unless aggregated where possible into the traditional Protestant/Catholic and Nationalist/Unionist categories. Our analysis is therefore based on these groupings.

Qualitative Information

5.10 Qualitative information was gathered through discussion with the following representative groups in Northern Ireland. Summaries of the interviews are available in Section 8 of this report.

- Northern Ireland Council for Ethnic Minorities (NICEM);
- Royal Society for Mentally Handicapped Children and Adults (MENCAP);
- Northern Ireland Dyslexia Association (NIDA);
- Disability Action; and
- Coalition on Sexual Orientation (CoSO).

5.11 In addition, a focus group with five test users (all students from Hong Kong) was held in Coleraine, facilitated by a Cantonese translator.

6.0 Assessment of Impacts / Key Findings

6.1 After carrying out the research, the following conclusions were made regarding the equality impacts of the theory driving test, laid out against the nine ‘equality social groupings’ specified in Section 75 of the NI Act.

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Gender

- 6.2 There is no significant difference between the pass rates for gender. Therefore, there is no evidence to suggest any differential impacts relative to gender.

Religion

- 6.3 There is no significant difference between the pass rates for Protestants, Catholics and those belonging to other religious groups. Therefore, there is no evidence to suggest any differential impacts relative to religious belief.

Political Opinion

- 6.4 There is no significant difference between the pass rates for Unionists, Nationalists and those specifying other political opinions. Therefore, there is no evidence to suggest any differential impacts relative to political opinion or affiliation.

Dependants

- 6.5 There is quantitative evidence to suggest that women with dependants are more likely to fail the test. The first time pass rate for this group is 50% compared to 56% for men with dependants and 72.4% for women without dependants.

Marital Status

- 6.6 There is no significant difference between the pass rates based on marital status. Therefore, there is no evidence to suggest any differential impacts relative to marital status.

Disability

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- 6.7 In terms of dyslexia sufferers and people with learning disabilities, there is qualitative evidence to suggest that they are more likely to fail the test due to:
- Study materials being difficult to read;
 - The test procedure being hard to read and understand;
 - A lack of awareness of the additional facilities available to assist candidates in taking their test; and
 - Reluctance to be seen as ‘different’ in using the voice-over or ‘one-to-one’ option.
- 6.8 The other aspect that must be considered when reviewing the data with respect to candidates with a disability is that according to the Theory Test contractor’s Customer Satisfaction Screen Survey results 76.1% of people with special needs did not notify the centre of their special requirements when booking their test. Therefore, the data currently available only reflects the pass rates for those candidates who have identified themselves as requiring some form of assistance. It is essential therefore that the issue of identification and access to the various test options be addressed to ensure the validity of further data collection within this group.

Age

- 6.9 There is quantitative evidence to suggest that people over the age of 24 are more likely to fail the test, with a first time pass rate of around 57% compared to 65.5% for those aged 24 and under.

Ethnic Group

- 6.10 There is qualitative evidence to suggest that people from ethnic minorities are more likely to fail the test due to:

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- A lack of knowledge of how to access the test service and the facilities available to assist them; and
- The fact that study materials are effectively only available in English.

Sexual Orientation

6.11 There is no evidence to suggest any differential impacts relative to sexual orientation.

7.0 Alternatives / Mitigation

7.1 The issues identified in the course of the Equality Impact Assessment are as follows:

- Many candidates who would benefit from using some of the additional facilities are not aware of them, and are therefore not using them;
- Where candidates are aware of the test adaptations available, some do not wish to draw attention to themselves as being ‘different’, and therefore do not use them;
- Translation services are free for some languages (through the use of voiceovers), but not for others. In line with the DSA’s policy with whom the DVTA share a joint authorities contract to deliver the theory test, should the demand for translation services for a particular language exceed 250 in one year, the authorities will give consideration to having that language provided as a voiceover;

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- The study texts are available in English only and are therefore not fully accessible to all candidates;
- Study materials were only available as text books which as highlighted by Mencap during interview severely disadvantaged people with learning difficulties. Study materials are now available in formats other than books which makes the information more accessible to a person with learning difficulties. Candidates can prepare for both parts of the theory test by using a range of study materials that best suits their needs including DVDs and interactive CD-ROM software;
- The products are widely available from most bookshops and The Stationery Office which offers a telephone and Internet ordering service;
- Some candidates may require extra time to complete the test;
- No disabled access at two of the theory test centres. This has since been addressed as all test centres are compliant with DDA from September 2004; and
- As a result of the public consultation the fact that the theory test was only available in three ethnic languages was an issue. The number of languages available has increased to twenty (including English).

7.2 DVTA proposes to take a number of steps to mitigate these issues that have not been addressed. Given the reasons for the theory test, i.e. to ensure safer drivers, and the risks to public safety if a minimum standard is not met, the DVTA is

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not able to consider a different policy or a reduction in the standards for various groups.

Publicity

- 7.3 The DVTA will carry out a publicity exercise, which will involve developing and circulating a fact sheet that fully identifies the range of test adaptations available. It will also point out that preparation training for the theory test may be available from the public, private and community / voluntary sectors. The leaflet will be targeted at representative groups, support groups, further education colleges, community groups and the list of consultee organisations contained in the DOE Equality Scheme.
- 7.4 The DVTA will also publicise the options available on its web-site, and look at the possibility of developing bilateral web-links with representative groups.
- 7.5 In response to comments provided by representative organisations during consultation, the DVTA will consult with various representative organisations regarding the content of the fact sheet and how best to target distribution. To ensure the widest distribution possible, the best option is obviously to forward a fact sheet to every candidate at the time they receive their provisional licence. DVTA will discuss the distribution issue further with various representative organisations.

Booking and Testing Procedures

- 7.6 Currently, there are call centre staff who are trained and designated as a special needs or CARE team. The issue seems to be one of candidates accessing the special options that are available. Therefore, DVTA will work with the test providers to improve the telephone booking process. The

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objective will be to present candidates with the test options available without them having to request them and without referring to them as ‘special’ adaptations. Candidates would then personally select the appropriate options from the full range of facilities available rather than having to request them from call centre staff. One such improvement that is being examined at present is how to structure the message a candidate receives on contacting the call centre to separate out candidates in a sensitive manner, while specifying the options available to them.

- 7.7 The Internet booking site for a theory test will also be reviewed in order to present the options available more clearly.
- 7.8 DVTA will review both the current testing and candidate contact procedures to reduce, and where possible improve, any aspect of using test adaptations which defines people as ‘different’.

Translation Facilities

- 7.9 Several consultees criticised the Agency’s policy which requires candidates for whom English is not their first language and for whom a voiceover facility is not available to personally pay for the services of a translator.
- 7.10 The Agency has given a great deal of consideration to this policy. During the deliberations, the Agency noted both the requirements of the European Directive 2000/43/EC- Implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, along with the provisions for translated tests in other EU Member States in 2001. Appendix C shows that, with the exception of Sweden, all other Member States either charge for or require the candidate to personally pay for the services of a translator.

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- 7.11 The Agency has also taken account of the fact that in facilitating translated theory tests at the centres, the test centres with the exception of Belfast must be closed to all other candidates for the duration of the test. The cost to the Agency in facilitating translated tests is therefore higher than the cost to the candidate of providing the translator.
- 7.12 The Agency has therefore decided to retain this policy for the time being. However the effect of this policy has been mitigated by the availability of additional voiceover support for 19 languages (see Appendix D).

Study Materials

- 7.14 The DSA holds a copy of the theory test question bank translated into each of the languages in which the theory test is conducted. Copyright licences for this material may be available to groups wishing to produce learning materials designed specifically to meet the needs of their members. DVTA will provide assistance to any group which wishes to obtain such a licence.

Time Allowed

- 7.15 The DVTA will examine the criteria for allocating extra time to candidates. Currently extra time to take the test is only made available in very limited circumstances. It is proposed that an examination of the criteria against which extra time is allowed be undertaken to see if there is scope for making this facility more readily available.

8. Formal Consultation on EQIA

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- 8.1 The EQIA was subject to a formal consultation exercise and consultation documents were sent to all those in Table C1 of the Department’s Equality scheme.
- 8.2 The Agency received eleven responses to the consultation exercise of which six were acknowledgements. DVTA is grateful to those organisations and individuals who responded which were:
1. Northern Ireland Council for Ethnic Minorities;
 2. Northern Ireland Committee I.C.T.U;
 3. Disability Action;
 4. Mencap; and
 5. Committee on the Administration of Justice.
- 8.3 Issues requiring response from the Agency are presented below.

Summary of Responses to Public Consultation

No.	Issue	Registered by	Agency’s response
1.	a. Concern that the impact assessment was done in isolation from the practical driving test and arrangements for obtaining a provisional driving licence.	1	A separate EQIA has been conducted on the practical driving test.
	b. An analysis of the dynamic between the driving theory and	5	

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		practical test is missing.		
2.	a.	Feeling that the impact assessment and the whole Section 75 process is more effective when carried out by the public authority themselves.	1	Noted. Comment needed over future use of consultants.
	b.	Concern about consultants carrying out work designed to promote mainstreaming within public authorities.	5	Noted.
	c.	Suggest that where the authority cannot undertake the assessment, a better approach is to work with the voluntary and community sector for example by funding the sector to facilitate consultation.	1	Noted. The Agency will consider.
3.	a.	The EQIA does not appear to give consideration to what the policy of the driving theory test aims to do.	1	Section 3, 'Policy Objective of the Theory Test' included.
	b.	There is little reference to defining the aim of the policy, namely how does the Driving Theory	5	Section 3 added.

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		Test impact on members of Section 75 groups in relation to their ability to drive unaccompanied on a public road in Northern Ireland		
4.	a.	Seems to have been little consideration of available data and research from other jurisdictions. Furthermore they feel the information could have been more clearly set out.	1	Other jurisdictions may not be relevant to Northern Ireland. Appendix B gives first time pass rates for S75 group.
	b.	Within the context of impact assessment, the test for adverse impact goes beyond the test in indirect discrimination for statistical significance.	5	Statistical significance is used as a first indication of impact. Pre – consultation should highlight issues not already brought out by quantitative analysis. Noted. Introduction to Section 6 re-written.
	c.	Welcome the points raised in the action plan but comment that there is no indication as to whether or not these are mitigating measures designed to reduce adverse impact or alternative policies that proactively promote	1	

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	equality.		
d.	Suggests highlighting the areas of particular concern more clearly	1	KPMG full report available from DVTA on request.
e.	No explanation of the link between the action points and the assessment of impact stage	1	Noted. Introduction to Section 6 re-written.
f.	Further detail of the purpose of consultation and give commitment to take into account comments and set out mechanism of feedback	1	Noted. Section 8 added.
g.	Would welcome the setting out of options for alternative policies and mitigation rather than stating what appears to have been decided already.	1	Noted.
h.	Would welcome information on the decision making process and how all views will be taken into account in the process plus a commitment to transparency	1	Noted. Section 8 added.

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	i.	Suggest a second look at the process may be required	1	Noted.
	j.	Suggests more information in relation to the data collection.	2	Section ‘Postal Survey of Test Users’ added at 5.4.
	k.	Criticism of the form of words in both paragraphs 1 and 2 of Appendix 1	2	Noted. Form of words re-drafted. Refer to Section 2.
	l.	Useful if the EQIA had contained information about the test adaptations which are available including those available to those with a disability	4	Noted. Section 4 added.
	m.	Recommend the assessment be redrafted to reflect the requirements of the practical guidance and in such a way as to incorporate the range of problems that different groups covered by Section 75 experience in relation to their ability to hold a full driving licence.	5	Final document completely redrafted. The remit of this EQIA is to examine problems that different groups experience in relation to taking a theory test only.
5.	a.	The fact that charging for translators and	1	Noted. Policy unchanged.

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	<p>interpreters may be indirect discrimination should have been highlighted in the assessments of impact stage. Where differential impact does not amount to discrimination it must still be identified and acted upon.</p>		
b.	<p>Consider the limited number of languages in which the theory test is currently provided is an adverse impact.</p>	1	<p>Noted and addressed in Section 6.</p>
c.	<p>See no reason why action cannot be taken now in line with the spirit and duties of Section 75 to provide interpretation and translation facilities.</p>	1	<p>Noted. Policy unchanged.</p>
d.	<p>For what languages, other than those already provided for did the research identify as being used in Northern Ireland?</p>	2	<p>None.</p>
e.	<p>What are the financial implications of providing translation services for all the languages used in</p>	2	<p>20 languages available by voiceover from September 2004.</p>

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	Northern Ireland?		
	f. Has a timetable been set to ensure compliance with the European Directive and the DDA? Recommends that DVTA should ensure translation facilities at test centres are free of charge for all languages.	2	Yes. See Section ‘Translation Facilities’ at 7.3.
	g. Concern that there is no provision in the test for users of Irish sign language	3	To date no demand has been demonstrated. <i>Irish is not an equality issue.</i>
	h. No mention of how to ensure language barrier does not prevent people from accessing the booking procedures.	1	
6	a. Not clear if the proposed leaflet will be sent to all those who apply for a test and will we be consulting with the groups representing those with disabilities and ethnic minorities on the content of the leaflet.	2	Issue now included in Section ‘Publicity’ at 7.3.
	b. By what means will DVTA undertake to increase awareness of the various test preparation	2	Issue addressed in Section ‘Publicity’ at 7.3.

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	products available and what resources will be made available for this.		
c.	Recommend that representative organisations are consulted about the design of leaflets and how best to target their distribution.	3	Noted. See Section ‘Publicity’ at 7.3.
d.	Recommend consulting representative organisations about how best to achieve wide publicity of study materials.	3	Noted.
e.	Suggests sending the proposed information leaflet to all candidates when applying for test.	4	See Section ‘Publicity’ at 7.3 Refer to bulk of tests booked via telephone, Internet – application form reviewed to offer facilities available.
f.	More details required on the publicity aspect of leaflet campaign.	1	See Section ‘Publicity’ at 7.3.
g.	In relation to study materials, are there likely to be CD-ROMs produced in languages that the current Theory	1	See Section ‘Study Materials’ at 7.14.

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	Test does not cater for?		
7	a. Comment on the absence of information in formats that are accessible to a person with learning difficulties.	4	See Section ‘Study Materials’ at 7.14.
	b. Commends for producing the EQIA in a range of formats, however, there is no text phone number available. This should be given urgent attention.	3	DVTA have installed a text phone at their Headquarters Text number 028 90 665453.
	c. Suggests some information on how and where the results of the assessment and the final decision will be published would be useful.	1	See Section 9.
8	a. More detail on how DVTA intends to monitor for future adverse impact and opportunities to promote equality would be welcome. Monitoring should be broader than just looking at the pass rate	1	Noted. Section 10 added.
	b. Recognises that alternative arrangements	3	Noted. Section 10 added.

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	to assist disabled candidates are not fully utilised, however the situation will require close monitoring of the arrangements for special needs candidates to ensure whatever is put in place addresses the imbalance.		
9	<p>a. How do we aim to improve the telephone booking process? Will call centre staff training be involved to provide information on the range of adaptations as routine?</p> <p>b. Suggest that staff undertake formal disability awareness training.</p>	<p>2</p> <p>3</p>	<p>Issue now included in Section ‘Booking and Testing Procedures’ at 7.2.</p> <p>This is already provided to both Agency and Test provider staff.</p>
10	Has DVTA considered raising the issues about ‘age’ with organisations such as Age Concern.	2	Organisations representing older citizens were consulted including Age Concern Northern Ireland. Full list of consultees attached as Appendix E.
11	Believes that more research is required to address the under representation of disabled people amongst people presenting themselves for the	3	Noted.

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	driving test		
12	Need to make test centres accessible for all disabled users rather than just wheelchair users	3	From September 2004 all test centres DDA compliant.
13	What alternatives/mitigating measures can be put in place to reduce the adverse impact currently experienced by young mothers?	5	Study materials available in varied formats to accommodate range of learning techniques.
14	The impact of the fee on the various groups has not been explored	5	Noted.

9. Publication of the Results of the EQIA

- 9.1 This Equality Impact Assessment has been published and copies will be issued to all consultees to inform them about the process undertaken, its outcomes and the decisions taken by the Agency.

The EQIA will be published on the Northern Ireland Civil Service website at www.nics.gov.uk/pubs/equalityimpact.

A copy will also be available on the Agency's website at www.doeni.gov.uk/dvta/publications.

Additional copies and copies in alternative formats, if desired, may be requested from:

Customer Services,
 DVTA Headquarters,
 Balmoral Road,
 Belfast

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BT12 6QL.

Telephone: 028 90 547915

Text phone: 028 90 665453

- 9.2 The general public has been informed of the availability of the Equality Impact Assessment through a press advertisement.

10. Monitoring for Adverse Impact in the Future.

- 10.1 In order to ensure the effectiveness of the actions being proposed and limit any adverse impacts, the Agency will monitor the information it obtains in relation to test volumes, pass rates, the use of the both the English and other language voiceover facility and the number of translated tests conducted. This will help identify further adverse impacts and enable the Agency to consider if further mitigating action is necessary.

Appendix A



Equality and Fairness Assessment

The Driver & Vehicle Testing Agency is committed to equality and fairness of opportunity for all users of our driving **theory testing** service. This is regardless of your gender, religious belief, political opinion, racial group, age, marital status or sexual orientation, and regardless of whether you have a disability or whether you are a person with dependants or not.

We are currently having an independent review of our practices and procedures conducted by KPMG Consulting, **and this is where you can help**. We would be grateful if you would take a few minutes to complete this survey form.

Completion of this form is purely voluntary but provides you with an opportunity to influence our policies, and the data will be used ONLY for analytical purposes.

To ensure the confidentiality of your return, you are not required to put your name to this form or sign it.

Please complete all sections of the form, and send it directly to KPMG using the pre-paid envelope enclosed.

Thank you for taking time to take part in this survey, and to help us improve the equality and effectiveness of our services quickly, please complete the questionnaire and post it to KPMG Consulting as soon as possible, preferably before the end of January 2001.

Brian Watson,
Chief Executive,

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DVTA.

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Equality and Fairness Questionnaire

Please tick the boxes where appropriate

On the **last** occasion you sat the driving **theory** test did you : Pass Fail

If you failed, how many questions did you answer incorrectly ? _____

How many times have you failed the driving **theory** test altogether ? _____

Gender: Female Male

Marital Status: Single Married Widowed

 Divorced/Separated Other

Age Group: 16 – 24 25 – 34 35 –44

 45 – 59 60+

Employment : At the last occasion when you sat the theory driving test were you :

Employed Self-Employed A job-seeker

In full-time education Unemployed and not seeking a job

Disability: Do you consider yourself to have a disability? Yes No

If **Yes**, please indicate the nature of your disability by ticking the appropriate box(es)

 Hearing impairment Sight impairment Speech impairment

Mobility/wheelchair user Dexterity impairment Limb impairment

 Personal care support Dyslexia Learning Disability

A disability not listed above, please specify _____

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Religion: Do you consider yourself to be: Protestant Roman Catholic
Baha'i Faith Buddhist Chinese Community Hindu
Muslim Jewish Congregation Sikh Religion

Other Religion (Please specify) _____

No religion

Persons with Dependants and persons without:

Do you have an individual(s) who is dependent on you : Yes No

Political Opinion:

Would you consider yourself to be a: Nationalist Unionist

Neither

Other (Please Specify) _____

Sexual Orientation:

Are You Heterosexual Homosexual Bi-sexual Transsexual Other

Race : Please indicate which ethnic group you consider yourself to come from:

White Irish travelling community Black African

Black Caribbean Indian Pakistani Chinese Bangladeshi

Pakistani Mixed Origin

Other (Please Specify) _____

Is English your first language? Yes No

If No, please specify which is your first language?

How would you rate your satisfaction with the test APPLICATION and BOOKING ARRANGEMENTS (scored between 1-10, where 1 is completely unsatisfactory and 10 is extremely satisfactory)?

Please specify any specific areas of the APPLICATION and BOOKING ARRANGEMENTS which you were unhappy with, or ways in which they could be improved :

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How would you rate your satisfaction with the TESTING ARRANGEMENTS (scored between 1-10, where 1 is completely unsatisfactory and 10 is extremely satisfactory)?

Please specify any specific areas of the TESTING ARRANGEMENTS which you were unhappy with, or ways in which they could be improved :

Were you aware of any alternative TESTING ARRANGEMENTS which the DVTA offer for candidates in terms of special needs or language difficulties?

Yes No

If you used any of the facilities offered by the testing centre for candidates with special needs or language difficulties, could you please describe which ones and rate how satisfied with each you were (scored between 1-10, where 1 is completely unsatisfactory and 10 is extremely satisfactory)?

If you might have benefited from using these facilities, and were aware of them but DID NOT use them, could you please indicate why?

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Do you have any suggestions as to how the application process could better accommodate people with disabilities or for whom English is not their first language?

Do you have any comments on current alternative testing arrangements for candidates with special needs or language difficulties and how they could be improved?

Is there anything about the Driving Theory Test which you think put you at an unfair disadvantage?

Yes : **No :**

If yes, please specify :

Thank you for your time. Please place this questionnaire in the pre-paid envelope provided, and post it to KPMG Consulting as soon as possible.

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Appendix B

Postal Survey Results

1. Quantitative Survey Results

The relevant results are most easily displayed in the table below, and we have gone on to discuss the attendant equality issues for each group below. It should be noted that the first time pass rate across the entire survey population was **63.6%**.

Category of Test User		% of Candidates Who Passed Per Attempt				
		1 st	2 nd	3 rd	4 th	5 th or more
Gender	Women	67.4%	20.6%	5.5%	5.0%	1.4%
	(n=218)	147	45	12	11	3
	Men	58.0%	23.0%	8.6%	5.2%	5.2%
	(n=174)	101	40	15	9	9
Religion	Protestant	65.1%	24.6%	4.8%	4.0%	1.6%
	(n=126)	82	31	6	5	2
	Catholic	65.9%	15.2%	9.1%	6.1%	3.7%
	(n=164)	108	25	15	10	6
	No Religion	55.2%	29.9%	6.0%	3.0%	6.0%
	(n=67)	37	20	4	2	4
Politics	Nationalist	70.6%	20.6%	5.9%	2.9%	0.0%
	(n=34)	24	7	2	1	0
	Unionist	63.3%	30.0%	3.3%	3.3%	0.0%
	(n=30)	19	9	1	1	0
	Neither	64.2%	19.7%	6.8%	5.7%	3.6%
	(n=279)	179	55	19	16	10

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Category of Test User		% of Candidates Who Passed Per Attempt				
		1 st	2 nd	3 rd	4 th	5 th or more
Dependants	People with dependants	52.2%	26.1%	14.5%	4.3%	2.9%
	(n=69)	36	18	10	3	2
	People without dependants	65.6%	20.5%	5.4%	5.4%	3.2%
	(n=317)	208	65	17	17	10
Marital Status	Single	64.3%	20.9%	6.5%	5.2%	3.1%
	(n=325)	209	68	21	17	10
	Married	57.1%	22.4%	12.2%	6.1%	2.0%
	(n=49)	28	11	6	3	1
Disability	People that feel they have a disability	26.3%	26.3%	21.1%	0.0%	26.3%
	(n=19)	5	5	4	0	5
Age	16 – 24	65.5%	20.8%	6.1%	5.1%	2.4%
	(n=293)	192	61	18	15	7
	25 – 34	54.5%	21.8%	10.9%	7.3%	5.5%
	(n=55)	30	12	6	4	3
	35 -44	50.0%	41.7%	0.0%	4.2%	4.2%
	(n=32)	12	18	0	1	1
	45 –59	73.7%	10.5%	15.8%	0.0%	0.0%
	(n=19)	14	2	3	0	0
	60+	0.0%	50.0%	0.0%	0.0%	50.0%
(n=2)	0	1	0	0	1	

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Appendix C

Fees Charged for Translated Tests by Other EU Member States

Country	Theory Test Fee (Euro)	Duration (minutes)	Test Available in Other Languages	Translator	Fee for Translator Paid by
Austria	9	45	Austrian Croatian Slovenian Turkish English	No	
Germany	9	No fixed time but around 45 mins	11 EU languages and Croatian	Yes	Candidate pays 300 euro
UK	23	40	20 languages	yes	Candidate
Netherlands	25	30		Yes	Candidate
Denmark	80*	25		yes	Candidate
Belgium	15	25	Dutch, French, German, English	yes	Candidate pays 100 euro
France	nil	45-50		For Cat C & D candidate must be able to speak French	Candidate
Spain	72*	30	For Cat B French, English, German	No	
Greece	100*	30		Yes	Candidate
Sweden	24	45	12 languages	Yes	No extra fee
Luxembourg	12* increase	45	French German	Yes	Candidate

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Country	Theory Test Fee (Euro)	Duration (minutes)	Test Available in Other Languages	Translator	Fee for Translator Paid by
	being considered		Portuguese		
Portugal	10	35		Yes	Candidate

*Fee covers theory and practical tests

Appendix D

Languages for which there is Voiceover Support from September 2004

Albanian
Arabic
Bengali
Cantonese
Dari
English
Farsi
Gujarati
Hindi
Kashmiri
Kurdish
Mirpuri
Polish
Portuguese
Punjabi
Pushto
Spanish
Tamil
Turkish
Urdu

Appendix E

Consultees

Age Concern Northern Ireland
Age Sector Reference Group
Alliance Party
Archbishop of Armagh & Primate of all Ireland
ATGWA
AWEU
Baha'i Office for Northern Ireland
Barnardos Northern Ireland
Barnardos Tuar Ceatha Project
Belfast Butterfly Club
Belfast Education & Library Board
Belfast Hebrew Congregation
Belfast Traveller Education & Development Group
Bishop of Down & Connor
British Deaf Association (Northern Ireland)
British Deaf Association Northern Ireland
Bryson House
Carafriend
Carers National Association Northern Ireland
CBI
Child Poverty Action Group
Childcare Northern Ireland
Children's Law Centre

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Chinese Welfare Association (Northern Ireland) Ltd
Chrysalis Women's Centre
Coalition on Sexual Orientation (CoSO)
Coiste-na n-iarchimi
Committee on the Administration of Justice
Community Relations Council (CRC)
Community Relations Training/ Learning Consortium
Craigavon Standing Conference of Women's Organisations
Cruse Bereavement Care (Northern Ireland)
CSPOA
Democratic Left
Democratic Unionist Party
Derry Well Woman
Disability Action
District Councils
East Belfast Community Development Agency
EET&P
Employers Forum on Disability
Equality Commission
Equality Forum Northern Ireland
Falls Community Council
Falls Women's Centre
Fermanagh Women's Network
First Division Association
Foyle Friend
Foyle Women's Information Network
Foyle Women's Network
Gay and Lesbian Youth Northern Ireland

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Gingerbread Northern Ireland

GMBATU

Help the Aged, Northern Ireland

Indian Community Centre

Institute of Directors

Labour Party

Law Centre (Northern Ireland)

Lesbian Line

Library, Parliament Buildings

Local Government Staff Commission

MENCAP (Royal Society for Mentally Handicapped Children and Adults)

Men's Movement N Ireland

MEPs

Methodist Church in Ireland

Mid-Ulster Women's Network

MLAs

MPs

Multi-Cultural Resource Centre

Newry & Mourne Senior Citizen's Consortium

Newry & Mourne Women

Newtownabbey Senior Citizens. Forum

NIACRO

NIPSA

North Eastern Education & Library Board

North West Community Network (Londonderry)

North West Forum of People with Disabilities (Derry)

North West Forum of People with Disabilities (Enniskillen)

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Northern Ireland Anti-Poverty Network
Northern Ireland Gay Rights Association (NIGRA)
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Islamic Centre
Northern Ireland African Cultural Centre
Northern Ireland Association for Mental Health
Northern Ireland Committee, Irish Congress of Trade Unions (NIC/ICTU)
Northern Ireland Council for Ethnic Equality
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Pensioners Convention
Northern Ireland Unionist Party
Northern Ireland Voluntary Trust
Northern Ireland Women's Aid Federation
Northern Ireland Women's Coalition
Northern Ireland Women's European Platform (NIWEP)
NSPCC
Omagh Women's Area Network
Parents Advice Centre
Playboard
POBAL
Presbyterian Church in Ireland
Progressive Unionist Party
Public Service Support Forum
Putting Children First
Queer Space
Relate

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Royal National Institute for Deaf People (RNID)

Royal National Institute for the Blind (RNIB)

Rural Community Network (Northern Ireland)

Rural Development Council

Save the Children

School of Environmental Planning

SDLP

Sense Northern Ireland

Sikh Cultural Centre

Sinn Fein

South Eastern Education & Library Board

Southern Education & Library Board

Sperrin Lakeland Senior Citizens Consortium

Staff Commission for E&L Boards

The Blind Centre

The Guide Dogs for the Blind Association

The Rainbow Project

The Women's Centre

Training for Women Network

Traveller's Movement Northern Ireland

UCAT

UK Unionist Party

Ulster Democratic Party

Ulster Scots Heritage Council

Ulster Unionist Party

ULTACH

UNISON

Volunteer Development Agency

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West Belfast Economic Forum

Western Education & Library Board

Women Together for Peace

Women's Forum

Women's Information Group

Women's Resource and Development Agency (WRDA)

Women's Support Network

Worker's Party

Youth Council for Northern Ireland