



DRIVER & VEHICLE TESTING AGENCY
COMPLIANCE STRATEGY
2003 - 2006

Compliance Section

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CONTENTS

	Page
1 BACKGROUND	4
Need for Compliance Strategy	4
2 OUTLINE OF COMPLIANCE STRATEGY	5
Overriding Principles	5
Vision of successful Compliance Strategy	6
Scope and Boundaries of the Compliance Strategy	6
Working in Partnership	8
Operation of the Strategy	8
3 CONSULTATION	9
Consultation with Agency staff	9
Vehicle Inspection in GB	10
Department of Transport ROI	10
Insurance Industry	11
4 EXTERNAL FACTORS RELEVANT TO COMPLIANCE	11
Vehicle Related Crime	11
Development of information technology	12
Looking ahead	12
5 AGENCY FUNCTIONS	13
Vehicle Testing	13
Driver Testing	16
Approved Driving Instructor Scheme	18
6 STRATEGY AIMS & OBJECTIVES	19
Strategic Aims	20
Key Performance Results	20
Customer Results	20
Internal Processes	21
Organisational Learning and Growth	21
Monitoring Delivery of Strategy	21

7	ACTION TO DELIVER STRATEGY	21
1	Development of information systems relevant to compliance	21
2	Development of partnerships to support compliance action	23
3	Provision of information and guidance to customers	24
4	Development of user-friendly systems	25
5	Undertaking enforcement action as appropriate	26
6	Research & development of methods to improve compliance	28
7	Development of the skills, knowledge and motivation of staff	30
Annex A	Strategy Map – Maximise Driver & Vehicle Compliance	
Annex B	Objectives, Measures & Targets	

COMPLIANCE STRATEGY PAPER

1 BACKGROUND

- 1.1 The primary aim of the Driver & Vehicle Testing Agency (the Agency) is to promote and improve road safety through the advancement of driving standards and implementation of government policies for improving the mechanical standards of vehicles. The Agency pursues this aim by the testing of drivers' competence, the roadworthiness of vehicles and the enforcement of regulations in respect of drivers' hours

Need For Compliance Strategy

- 1.2 A number of factors in recent years have highlighted the need for the Agency to develop a strategy to reduce non-compliance with the MOT system. Analysis of a survey conducted by the Driver and Vehicle Licensing Agency, Northern Ireland (DVLNI) in June 1999 estimated that 10% of the vehicles on the road were unlicensed and that the majority of these were over the MOT age threshold. A Northern Ireland Audit Office (NIAO) Report, November 1999 highlighted that there was no effective system in place to ensure that all vehicles, that were required to be tested, were actually submitted for testing. The NIAO report recognised that the problem of evasion could only be addressed effectively through joint efforts by the DVTA, DVLNI and the PSNI. The lack of access to a central database of information was seen as a major drawback and it was recommended that new IT systems should be developed and implemented as a matter of urgency.
- 1.3 The Northern Ireland Public Accounts Committee's report of October 2000 stated that "the fact that there are 63,000 unlicensed vehicles in use on Northern Ireland's roads, the majority of which are over MOT age, has significant implications for road safety and is a serious indictment of enforcement. We welcome DOE's acknowledgement that this is completely unacceptable and note the action which is being taken to address the problem."

- 1.4 In November 2000 the Driver & Vehicle Operators Group, Northern Ireland (DVONI) approved outline proposals by the DVTA to commence a debate on initiatives to reduce non-compliance and to carry out a major survey on levels of compliance.
- 1.5 A further survey conducted by the DVLNI in June 2002 showed that Northern Ireland had a VED evasion rate of 10.1% with a loss of duty of £13m.
- 1.6 There is also evidence of non-compliance in respect of drivers with the number of unlicensed drivers on the road increasing and a view that many drivers would not satisfy the driving test eyesight standard.
- 1.7 The Northern Ireland Road Safety Strategy 2002 – 2012 launched in November 2002 has set targets to reduce death and serious injuries by 33%. Central to this are objectives in respect of driver testing, approved driving instructor scheme (ADI) and vehicle testing. The DVTA will review the cost and benefits of reducing the age of the roadworthiness test (MOT) for cars and motorcycles from 4 years to 3 years, taking account of public opinion and the position in Great Britain, where 3-year testing is required.

2 OUTLINE OF COMPLIANCE STRATEGY

Overriding Principles

- 2.1 The development of the compliance strategy was influenced by a number of overriding principles. The strategy should:
 - have a clear vision of future success;
 - meet the needs and expectations of key stakeholders and customers;
 - be forward looking and outward looking;
 - be based on the best available evidence; and
 - have clearly defined aims, objectives and targets.

Vision Of Successful Compliance Strategy

- 2.2 During fact-finding, staff in the Agency provided insights into their interpretation of a successful compliance strategy. It is “the creation of a compliance culture” in which vehicle owners and drivers recognise and value the contribution that testing makes to road safety and to a cleaner environment and wish to comply. This can be achieved by providing customers with information on the benefits of the MOT test and having user-friendly systems to make it easier to comply than not to comply.

Scope And Boundaries Of The Compliance Strategy

What Compliance Means

- 2.3 The term compliance is frequently used within the Agency and Department in relation to vehicle testing and licensing requirements. It may not however mean the same thing to all people. The need for a compliance strategy was first considered as a result of the high levels of Vehicle Excise Duty (VED) evasion particularly in respect of older vehicles, and the conclusion from this that there is likely to be a high level of evasion in respect of the MOT test. Compliance is relevant to all of the work of the Agency and systems have compliance built in as a control mechanism to ensure that testing is undertaken in accordance with statutory requirements. Compliance in terms of this strategy, however, relates more to how vehicle owners and drivers comply with the legislation under which the Agency operates and their obligations to ensure that they are properly licensed to drive and that their vehicles are maintained in a roadworthy condition.

Scope of Compliance

- 2.4 Consultation, particularly within the Agency, identified differences in viewpoints with regard to the range of activity that the compliance strategy should address. Traditionally the Agency has been responsible for testing, and enforcement has been seen as the responsibility of others. It is accepted that this situation changed to some degree with the incorporation of Enforcement Section to the remit of the Agency and the work undertaken by this Section in respect of, for example, enforcing

regulations relating to taxi vehicles and drivers. The following viewpoints were expressed on the scope of the proposed strategy:

- It is accepted that DVLNI should continue to be the main enforcement body for MOT through requiring evidence of the test when renewing motor tax. Unfortunately this does not mean that all vehicles that are taxed comply with MOT requirements. There was consensus that the Agency should have responsibility for ensuring that vehicles registered with the DVLNI should have where required a valid MOT certificate.
- To date the Agency has been responsible for ensuring that vehicles are roadworthy when presented for the test. There is a view that the Agency should include some responsibility for the checking of roadworthiness of vehicles on the road at other times. Under current legislation the Agency has powers to carry out roadside inspections.
- With regard to driver testing it is accepted that the Agency should have responsibility for ensuring that all drivers take the test and satisfy the preconditions. While there is a widely held view that many drivers who hold driving licences would not pass today's driving test it was considered at this time that responsibility should not extend to the competency of drivers who have passed the test.

2.5 The approach considered appropriate for drivers may appear inconsistent with that deemed suitable for vehicles. It is, however, the case that the Road Safety Branch, DOE and the PSNI undertake more work in respect of driver behaviour in terms of publicity campaigns and enforcement. While it is important that compliance strategy covers all Agency key functions it should be flexible enough to address each function in the most appropriate manner.

Range of work addressed

2.6 This strategy covers the broad range of work undertaken by the Agency and therefore reflects compliance initiatives presently in operation in Enforcement Section and also those that are being introduced in respect of the ADI scheme.

- 2.7 While the strategy will address vehicle testing, driver testing and the ADI scheme it is important to note that vehicle testing represents approximately 80% of the work of the Agency and that it was concerns about non-compliance in this area that were the main driver for a compliance strategy to be developed. During fact-finding and consultation the issues related mainly to vehicle testing and this is reflected in this document. Nevertheless the strategy will include provision for surveys to be undertaken across the full range of activity and when reviews of the strategy are undertaken (recommended on an annual basis) the emphasis may well change.
- 2.8 The strategy will contribute directly to the Agency's stated aims and objectives. If it is considered that, to deliver the objectives of strategy, activity may be required outside those areas that traditionally undertaken by the Agency the Department's approval will be sought.

Working In Partnership

- 2.9 Success of the strategy will only be achieved through working in partnership with a number of key bodies including the DVLNI, PSNI, Road Safety Branch (DOE), ROSPA and representatives from the insurance industry.
- 2.10 The Agency will also maintain links with sister bodies in Great Britain and the ROI to compare processes and results and will undertake fact-finding in respect of organisations involved in driver and vehicle testing across the world.

Operation of the strategy

- 2.11 In order to plan and organise the necessary work involved in delivering the strategy the following key activities will be undertaken:
- surveys to determine levels of compliance/non-compliance in respect of key Agency functions
 - prioritisation of areas for action i.e. high non-compliance and key to Agency aims of improving road safety and contributing to a cleaner environment

- identification of initiatives to increase compliance; and
- development of new policy and changes to legislation if required

3 CONSULTATION

3.1 In developing this strategy consideration has been taken of published reports, evidence of non-compliance, legislative requirements and meetings held with many people from within the Agency, the Department and public bodies in Northern Ireland. Comparison visits were made to Great Britain and the Republic of Ireland (ROI). Consideration was also given to a number of factors relating to the external environment which although not directly relating to driver and vehicle testing have significance for any action that may be taken.

Consultation with Agency staff

3.2 Individual meetings and a workshop were held with key staff in the Agency. Among a wide range of issues discussed, the following issues were presented for consideration:

- Compliance action should have a strong focus on road safety
- A need to give priority to the compliance issues which are key to the Agency's aims and objectives
- It is important to have accurate information – a baseline figure on non-compliance
- The inclusion of roadside checks/ tests to obtain information on roadworthiness
- The need to change the public's attitude to MOT – encourage people to see it, not as a necessary evil but as road safety imperative; this could reflect positively on the image of the Agency
- The Agency should assist where appropriate with issues that are relevant to society e.g. reducing vehicle related crime
- Enforcement should play a key role in compliance

Vehicle Inspection in GB

- 3.3 The MOT system in Great Britain being quite different to that in Northern Ireland does not offer a direct comparison. There are however some areas where we can gain from their experience. The Vehicle and Operator Services Agency (VOSA) is developing a 3-5 year compliance strategy and intends to include a new performance measure for compliance in the Inspectorate's corporate plan. At this stage they do not have accurate information on compliance levels but the numbers of vehicles without valid MOT certificate is assumed to be about 6%.
- 3.4 Computerisation of information systems, which will roll out in 2003, will facilitate the introduction of MOT discs. In the longer term as information systems are developed and linked to those of other bodies it is intended that the emphasis will be on electronic checks of vehicles to establish if vehicles are compliant. This will utilise modern technology such as automatic number plate readers and electronic vehicle identification.

Department of Transport ROI

- 3.5 Compulsory car testing was introduced in the Republic of Ireland (ROI) in January 2000. The testing system has been at near capacity since this time. While detailed information on compliance is not available it is considered that compliance with the system is very high in respect of newer cars and low for older cars.
- 3.6 Reminders from motor tax records are sent to all vehicle owners when the test is due. Cars are tested when four years old and then after every two years on the same date as the original registration. This means that if a car is tested late a certificate covers a shorter period and there is, therefore, no financial benefit. Drivers have to display a National Car Testing Service disc to show that their cars have passed the test.

Insurance Industry

- 3.7 The UK has one of the worst records in Western Europe with regard to the number of uninsured drivers with an estimated one in twenty cars on the road being driven without proper insurance cover.
- 3.8 The PAC in recommending that compulsory display of MOT discs should be introduced as quickly as possible also stated that this should be extended to include insurance discs. The Association of British Insurers (ABI) while not in favour of introducing insurance discs has proposed the creation of a central insurance database to be accessible by the police for enforcement purposes. The necessary legislation has been effected in both GB and NI allowing the police when they have stopped a vehicle to establish from the database whether there is insurance cover for its use and whether the driver is one of those named as covered by the policy.

4 EXTERNAL FACTORS RELEVANT TO COMPLIANCE

- 4.1 Some issues not directly related to the work of the Agency but which may impact on a compliance strategy.

Vehicle Related Crime

- 4.2 Aside from the road safety, environmental and financial issues that result from evasion of MOT, VED and insurance, the fact that vehicles and drivers cannot easily be identified can facilitate crime, with 20% of all recorded crimes being vehicle related. Many of these involve serious crime including “joy riding”, murder, rape and armed robbery. Abandoned cars are also becoming an increasing problem leaving public bodies with an expensive removal problem. Nearly 340,000 cars are stolen in the UK every year with about 120,000 never recovered. A reduction in non-compliance and the knock-on effect on vehicle crime can only be achieved through key bodies working together sharing information and matching records. Vehicle testing plays a key role in that it is the only system whereby the identification of all older vehicles is routinely checked.

Development of information technology

- 4.3 The development of information technology and computerisation of records will open up a range of opportunities where non-compliance can be addressed. These will include:
- the potential to have linked databases that would allow key users to have access to up to date records on MOT, VED and insurance. By accessing information provided by other users each could check the accuracy of information, be aware of changes of addresses etc. The DVTA could benefit particularly by identifying vehicles that require MOT and by the PSNI obtaining up-to-date information on those vehicles that do not have a valid MOT certificate
 - the use of cameras with automatic number plate readers have proved to be very successful for the DVLNI to detect VED evasion, by the PSNI for speeding and red light jumping and also by the Vehicle Inspectorate in GB to detect vehicles evading MOT

Looking ahead

- 4.4 There are ongoing developments in a number of areas that are appropriate to the work of the DVTA. In developing a compliance strategy it is important to be aware of these and to be in a position to take advantage of opportunities that may arise.

One to Three Years

- 4.5 There will be significant development of databases by DVLNI, Insurance Industry and the PSNI and it is intended that the PSNI will have computers in all police cars with access to information on VED/MOT.
- 4.6 It is likely that continuous registration will be introduced as a measure to combat vehicle crime and the abandonment of vehicles. Proposals being considered would tighten up the procedures for vehicle registration and to ensure that registered keepers of vehicles remain liable for them until proper notification of change of ownership has been completed.

Four to Five Years plus

- 4.7 A virtual database of DVLNI, Insurance Industry, PSNI, and MOT records will be developed. This would mean that, although there would still be individual database, searches could be undertaken, across the databases as if it was a single database. There would of course be appropriate security restrictions to restrict the flow of certain data.
- 4.8 Vehicle identification at present is confined to information on the vehicle registration logbook, registration marks on number plates and vehicle identification numbers on the vehicle chassis and engine. It is likely that electronic vehicle identification (EVI) of vehicles will be introduced in the future as a measure to reducing such practices as replacing the identity of a vehicle (in most cases stolen) with another vehicle, such as one previously written off as a result of a serious collision. The introduction of EVI is being investigated by the Department for Transport and will almost certainly happen within the next five to ten years. EVI will, through the use of technology, provide the opportunity for information on a vehicle to be tracked by the police or approved parties, for example in the collection of road tolls.
- 4.9 The increased prevalence of on-board diagnostics should significantly improve the information available on, for example, the state of braking systems.

5 AGENCY FUNCTIONS

Vehicle Testing

Background

- 5.1 Testing of vehicles represents about 80% of the Agency's work with some 600,000 tests carried out each year. Buses, lorries and taxis are tested annually from first registration; private cars, vans and motorcycles are tested annually from four years of age onwards.

Requirements of Vehicle Owners

- 5.2 The requirements of vehicle owners are set out in Article 54 of The Road Traffic (Northern Ireland) Order 1995. The Order states that “a person is guilty of an offence if he uses a motor vehicle or trailer on a road when...the condition of the motor vehicle or trailer... is such that the use of the motor vehicle or trailer involves a danger or injury to any person”. The Order also states in Article 63 that “a person who uses on the road or other public place at any time, or causes or permits to be so used, a motor vehicle to which this Article applies, and as respects which no test certificate has been issued within the appropriate period (12 months is stipulated) before that time, is guilty of an offence”

Evidence of non-compliance

- 5.3 As indicated earlier, in terms of the Agency’s responsibilities, non-compliance in respect of vehicle testing is a significant area of concern. DVLNI surveys indicate that 10% of vehicles in use on Northern Ireland’s roads are unlicensed, the majority of which are over MOT age.
- 5.4 In November 2000 the DVO approved outline proposals by the DVTA to explore a range of initiatives to reduce non-compliance. The need to carry out a major compliance survey, along the lines of that undertaken in GB, was considered necessary. Limited surveys on MOT evasion in respect of vehicle testing were undertaken and these indicated that MOT evasion could be as high as 30 per cent. A recent survey has been undertaken to establish the extent to which MOT certificates are not renewed on time. Further surveys could address MOT evasion for vehicles in use and also the roadworthiness of vehicles of all ages in use.

Surveys on non-compliance with MOT system

- 5.5 The first of the planned surveys, on analysis of MOT certificates not renewed on time, was produced in November 2002. The key results from the survey show that:
- 71% of certificates are not renewed before the old certificate expired;
 - 33% of certificates were not renewed 28 days after the expiry date; and
 - the average number of days for renewal of late certificates is 59 days.
- 5.6 A second survey, in respect of vehicles sighted on the road in June 2002, showed that 28.4% of the vehicles of MOT age did not have a valid MOT certificate. If this were reduced by 25% in three years to 21% then an additional 38,000 vehicles would be tested in year three generating additional gross income of £1,064,000 for this year alone.
- 5.7 Where factual evidence of non-compliance has been identified, targets for improvements will be set and initiatives suggested as part of this strategy. In respect of the percentage of certificates renewed by the expiry date and the average number of days late in renewing, targets of 25% improvement over the period 2003 to 2006 have been suggested. This is in line with DVLNI's targets in respect of VED evasion.

Enforcement Section Responsibilities

- 5.8 Tests on vehicles and checking of drivers' licensing and insurance requirements at the roadside are undertaken by the Agency's Enforcement Section. While the Agency took responsibility for the management of Enforcement Section in October 2000 the running costs of the Section is by means of central funding from the Department. For the period 2002-3 this is £901,000.
- 5.9 Enforcement Section has responsibility for the examination of lorries, buses, coaches and taxis for road traffic offences. Action may involve prohibiting defective vehicles from being used on the road and recommending prosecution where appropriate. Future work will require

that European Directives on enforcement action on checking of drivers' licensing and insurance requirements be considered. The main areas of compliance work at present include:

- Vehicle Weights
- Vehicle Roadworthiness
- Tachographs and Drivers Hours
- Enforcement of Vehicle Excise Duty
- Enforcement of Public Service Vehicle (Bus and Taxi) Regulations
- Enforcement of Driver Licensing and Insurance requirements
- Clean Air (Emissions)
- Enforcement of Special Types Vehicles (Abnormal Loads)

5.10 While historically the Agency has not as a matter of course undertaken roadside tests on private cars there have been exercises undertaken from time to time. Article 75 of The Road Traffic (Northern Ireland) order 1995 states that "an authorised examiner may test a motor vehicle on a road or other public place for the purposes of.... ascertaining whether the following requirements, namely,the condition of the vehicle is such that its use on the road would involve a danger of injury to any person."

Driver Testing

Background

5.11 The Agency carries out a total of 47,914 tests per year, which include L Tests (40,761), Motor Cycle (4,028), LGV (2,296), PSV O/Bus (487), and Vehicle & Trailer (342). Enforcement Section undertakes assessment of drivers to ensure compliance with driver licensing and drivers' hours requirements and the assessment of drivers and operators to ensure compliance with all relevant legal requirements.

Requirements of drivers

5.12 In order to apply for the practical L Test drivers must have passed a written theory test, which from January 2003 incorporates a hazard perception test.

5.13 There are separate driving tests for people who will be driving:

- goods vehicles with a permissible maximum weight (including any trailer) of more than 3.5 tonnes;
- passenger carrying vehicles; and
- tractors.

5.14 There are specific tests for people who wish to become Approved Driving Instructors and also extended driving tests for people who, at the discretion of a Court, must undergo a driving test.

5.15 In order to undertake the driving test candidates must have a provisional licence suitable for the test they intend to take, satisfy the minimum age limit requirement and have passed an eyesight test. Until they have passed the driving test they must display an L Plate and on passing must display an R Plate. All L-drivers and R drivers for the first year must drive at a speed not exceeding 45mph. Learner motorcycle drivers can ride a bike up to 125cc; if they are successful in the test they can then ride a bike up to 33 brake horsepower for two years.

Evidence of Non-Compliance

5.16 The remit of the DVTA is to test drivers' ability to drive safely on the road. While there is nothing to suggest that there is large-scale non-compliance with Agency requirements there is evidence from PSNI, insurance industry and DVLNI surveys that the number of unlicensed drivers on the road is increasing. While the overall numbers would be lower, the percentage of unlicensed riders of motorcycles and scooters is high and a particular problem is that of motorcyclists riding motorbikes of a higher brake horsepower than they are licensed for.

5.17 There is evidence that many drivers who may have held licences for many years could not satisfy the competency requirements of today's test. In a recent RAC study 25% of people polled failed the driving test eyesight standard. Another survey of 17,000 drivers indicated that 67% of drivers would fail the new L test. It should be noted however that the vast majority of accidents involve young male drivers. With regard to motorcyclists while the numbers of recorded accidents is quite low PSNI

road traffic accidents statistics show that the number of motorcycle accidents is increasing, with 19 people killed in 2002 as against 11 in 2001 and 7 in 2000.

Approved Driving Instructor Scheme - Background

- 5.18 The Approved Driving Instructor (ADI) scheme, which has been administered by the DVTA since the Agency was formed in 1992, is regulated under the provision of the Road Traffic (Northern Ireland) Order 1981. The scheme is similar to that administered by the Driving Standards Agency (DSA) in Great Britain which has a slightly wider remit including responsibility for instruction of HGV drivers.
- 5.19 The ADI scheme has remained relatively unchanged for some years. A review of the ADI scheme in GB has taken place and following on from this the DVTA has begun a separate similar review of the ADI scheme in NI. As part of this review a public consultation exercise was undertaken in the early part of 2002. The development of the strategy in respect of the ADI scheme, as outlined in this document, reflects the work undertaken as part of the review of the ADI scheme and which has been recorded in a separate paper "Review of ADI Scheme."

Requirements of ADIs

- 5.20 There are approximately 700 ADIs on the register. The purpose of the scheme is to maintain and improve the standards of driving instruction available to the general public and to ensure that the public can rely upon an acceptable minimum standard of tuition from registered driving instructors. The scheme is open to people who:
- hold a full Northern Ireland or Great Britain car driving licence;
 - have held a licence for a total of four years out of the past six years preceding date of application;
 - have not been under disqualification from driving, nor have been subject to 'R' plate restriction for more than 12 months in any period of the 4 years preceding the date of the application; and
 - are considered to be a fit and proper person to be added to the register, (all convictions which are not spent will be taken into consideration when deciding suitability).

- 5.21 In order to become an ADI and be added to the register the applicant must pass a qualifying examination, which includes a written theory test, a test of driving ability, and a test of ability to instruct.
- 5.22 Applicants to the scheme can apply for a trainee licence, which entitles them to provide instruction for six months, but must then pass the qualifying tests. A trainee licence allows an instructor to carry out instruction in return for money. During the six-month period the trainee must be accompanied by a registered ADI for 20% of the time. An applicant can have a maximum of two trainee licences.
- 5.23 Registration covers a period of four years after which it must then be renewed. During this period they may be subject to periodic inspections, known as ‘the check test’, in order to prove their continued ability and fitness to give instruction.

Evidence/Significance of Non-compliance

- 5.24 The main area of non-compliance is that of people who are not on the register or who do not have a trainee licence taking money for instruction. The incidence of this is considered to be higher in Belfast and built up areas than in rural communities.
- 5.25 Non-compliance in this area may be particularly significant given the disproportionately large number of new and young drivers involved in road traffic accidents.

6 STRATEGY AIMS & OBJECTIVES

- 6.1 In developing the compliance strategy it is essential that the aims and objectives are consistent with those of the Agency. The highest-level outcomes of the compliance strategy are therefore improved road safety and improved air quality.
- 6.2 The development of a new strategy, by its nature, will identify a number of new issues that need to be addressed and it is unlikely that all of the issues will fall easily into existing plans. The Agency has for example largely been responsible for testing, and enforcement has been the responsibility of others. Comments in the PAC report and the inclusion of Enforcement

Section in the remit of the Agency are evidence of change. In the development of an action plan to deliver this strategy decisions will have to be taken with regard to how the work should be prioritised, if the work is the responsibility of others or if it should be undertaken jointly.

Strategic Aims

6.3 The aims of the compliance strategy are:

“To maximise compliance with the Agency’s policies in respect of advancing driving standards and improving mechanical standards of vehicles”

6.4 The balanced scorecard methodology was used to provide a structure for the delivery of the strategy and this commences with a strategy map as outlined at Appendix A. The four perspectives used in the development of the strategy map are key performance results, customer results, internal processes and organisational learning and growth.

Key Performance Results

6.5 The rationale of the strategy map is that in order to meet the stated aims of the strategy, specific business objectives must be met. These have been defined as:

- Vehicles maintained in roadworthy condition
- Competent drivers on the road
- Vehicles presented for MOT test when due
- Drivers tested to agreed standards

Customer Results

6.6 It will only be possible to achieve these objectives if we identify and meet customer expectations. These have been identified as:

- knowledge of the benefits of MOT test / vehicle maintenance and the need for competent driving;
- the provision of user-friendly systems with easy access to testing; and
- information on what is required of them to comply with Agency systems.

Internal Processes

6.7 Meeting customer needs will involve the delivery of key

business processes which will include:

- Provision on information and guidance
- Development of database of information relevant to compliance
- Research & development of methods to improve compliance
- Development of partnerships to support compliance action
- Undertaking enforcement action as appropriate

Organisational Learning and Growth

6.8 To deliver these processes the organisation will need to have the appropriate knowledge and skills and have the appropriate support and commitment. The strategy can only be delivered by the whole organisation working to achieve common aims and objectives, commitment to the compliance strategy from the top down, and compliance accepted as being everyone's responsibility.

Monitoring Delivery of the Strategy

6.9 The objectives, measures, baselines, targets and key tasks for the strategy have been set out in the outline action plan at Appendix B. As this is a new strategy, historical data is not available in most cases to establish baselines. In such cases the key task will include the need to carry out a survey or some research to establish the baseline level of compliance, targets for improvement and initiatives required to achieve the target.

7 ACTION TO DELIVER STRATEGY

OBJECTIVE 1 - Development of information systems relevant to compliance

7.1 While there is a general view that compliance with the MOT test is low, there is limited evidence to support this, nor is there information on compliance levels with other Agency functions. There is an assumption that those vehicles not taxed have in most cases not been tested and this

and other indicators would suggest that there are problems that needs to be addressed. There is also increasing evidence of drivers using vehicles that they are not licensed to drive.

7.2 The refinement and delivery of the compliance strategy will be based on:

- Establishing baseline compliance levels for each Agency function
- Assessing the significance of the compliance level in terms of Agency aims
- Setting targets for improvement, determining and prioritising action

7.3 Surveys on compliance levels will be required across the range of Agency activities and have recently commenced with analysis of the number and extent of MOT certificates not being renewed on time, and the number of vehicles on the road without a valid MOT certificate. As targets are set and initiatives agreed, information will be required to monitor improvements in compliance levels. Accurate information will also be required to support enforcement action, to provide information and guidance to customers and in investigating new methods to increase compliance.

7.4 Computerisation of the systems in the Agency will mean that a lot of data will be held electronically but exercises will be undertaken to develop reporting systems required for monitoring compliance levels. In developing knowledge on both driver and vehicles populations arrangements are being developed and will continue to be developed with the DVLNI. In the future it is hoped to have databases that are linked to other organisations so that each organisation can benefit from having access to up-to-date accurate information on all vehicles.

Key Tasks 2003 - 2004

- Develop information systems to monitor levels of compliance
- Undertake surveys to determine baseline level of compliance in key areas (renewal of MOT Certificates, MOT evasion, vehicle roadworthiness at roadside stops, drivers licensed, competence to drive)
- Undertake exercise to reconcile vehicles registrations from DVLNI systems with estimated throughput of MOT system

- Develop arrangements to obtain information from other Agencies
- Analyse Enforcement Section statistics with regard to impact on road safety, the environment
- Gather information on fraudulent practices used to avoid Agency tests
- Gather information on vehicles presented which do not match documentation
- Gather information on main reasons for test failures

OBJECTIVE 2 - Development of partnerships to support compliance action

7.5 In carrying out the initiatives outlined in this strategy significant benefits can be gained from working in partnership with other bodies. A number of bodies are presently seeking to reduce non-compliance in respect of vehicle excise duty, vehicle insurance and other offences relating to road traffic regulations. Initiatives to reduce vehicle related crime require the cooperation of a range of bodies. The Agency can benefit from access to accurate up-to-date information on vehicles and drivers, road accident statistics and evidence of roadworthiness from surveys undertaken by other bodies. There are also areas however where the Agency could benefit from joint-working for example, running publicity campaigns and researching new methods to improve compliance. The Agency, being the only body to routinely check the identity of vehicles, has much to offer given the inherent shortcoming in current vehicle identification systems.

Key Tasks 2003 – 2004

7.6 Identify bodies where compliance could be assisted by working in partnership with other bodies and consider nature of arrangements. Examples could include:

- DVLNI for exchange of information, development of joint database, opportunities for learning
- PSNI with regard to need for information relating to compliance, trends in fraud relating to MOT Certificates etc.; to encourage more roadside

stops and to promote better follow-through of ADI cases which are referred to the police.

- The Association of British Insurers to ask them to require applicants seeking insurance to provide driving instruction for reward to submit proof of their registration; to clarify the position on whether a vehicle is properly insured when it is driven without a valid test certificate; and to check for MOT certificate before providing insurance.

OBJECTIVE 3 - Provision of information and guidance to customers

7.7 The level of compliance ultimately depends on the cooperation of the Agency's customers (vehicle owners and drivers) with the Agency's systems. Lower levels of compliance will result from customers being unaware of their obligations, forgetting to take the required action or deliberately evading the system. To increase compliance action may be required to:

- Modify the systems so that it is easier to comply than not to comply
- Provide incentives to encourage and reward compliance
- Target enforcement action on those who do not comply

7.8 The initial stage in implementing a compliance strategy will be to determine accurately the level of compliance in respect of the Agency's key functions and to assess the impact in terms of the Agency's aims. To change customer behaviour it will be necessary to establish vehicle owners and drivers' knowledge, understanding and perceptions of the Agency's systems. Analysis of this information should assist us in taking the appropriate action to ensure that customers value the Agency's work and that the systems make it as easy as possible to comply. It may also be appropriate to take action to change perceptions of the Agency's work through provision of information on the benefits of testing and how it can impact on them and the general public in terms of road safety and the environment.

- Undertake market research to determine customer attitude to DVTA functions
- Run publicity campaign to increase awareness / benefits of MOT test / good vehicle maintenance (could be undertaken in conjunction with roadside checks of roadworthiness)
- Provide information on obligations of all vehicle owners
- Publicise Agency action on non-compliance to improve image of Agency e.g. defaulters prosecuted (appeal to law abiding vehicle owners)
- The launch of a Code of Practice for ADIs;
- Improved advice in the 'Learning to Drive' leaflet about how to engage a bona-fide ADI.
- Launch a poster campaign aimed at learner drivers.
- Highlight issue in any publicity material as the opportunity arises: Customer Charter and Code of Practice, application forms, ADI Update, Internet site, Annual Report.

Objective 4 - Development of user-friendly systems

7.9 Since the creation of the Agency customer satisfaction has been given very serious consideration. There have been regular customer surveys and meetings with customer representatives to develop a service that meets expectations. Many changes have been introduced including flexible methods of payment, improved reception areas, extended testing periods, reduced waiting times etc. and this has resulted in increased customer satisfaction ratings and a reduction in complaints.

7.10 Circumstances are changing, a high level of customer service is expected, and it is only through computerisation that the needs and expectations of modern day customers can be met. People expect to receive a reminder and to be able to book by telephone or even on the internet.

7.11 Introduction of the computerised booking system and the MOT2 system will bring many improvements to customer service and should contribute to increased compliance. Over the next year implementation of the booking system will include telephone booking, extended hours booking, payment by debit card, on-line booking, reminders and a greater flexibility to allocate slots across the province. Implementation of MOT2 facilitates

an MOT certificate with a disc suitable for display, involves an easier testing process for vehicle owners (not having to drive over a pit) and an increased capacity to test.

7.12 These significant changes should result in a more user-friendly system. It will be necessary to seek customer feedback, respond to changing needs and to monitor and learn from testing systems in other jurisdictions. In the ROI, for example the reminder system includes notification of the test date saving people the need to actually book the test.

Key tasks 2003 – 2006

- Examine all customer interfaces to consider impact on compliance
- Implementation of booking system including telephone booking, extended hours, payment by debit card, on-line booking, reminder system and greater flexibility to allocate slots across the province
- Implementation of MOT2 including certificate suitable for display, enhanced data collection on testing results, increased capacity to test, easier process for vehicle owners
- Consider needs of customers who wish to book by traditional methods (consider future requirements of counter service)
- Consider new methods to increase compliance (easy payments schemes, direct debits, discounts)
- Benchmark with other organisations to consider best methods

Objective 5 - Undertaking enforcement action as appropriate

7.13 Enforcement, in respect of driver licensing and testing of private cars and motorcycles, has traditionally not been part of the Agency's remit but has been carried out by the DVLNI and the PSNI.

7.14 Enforcement Section, which came within the remit of the Agency in 2000, enforces a wide range of legislation pertaining to goods vehicles, buses and taxis. It also undertakes a limited number of checks on private cars and agricultural vehicles.

7.15 The development of a compliance strategy, introduction of reminders for vehicle tests and the inclusion of Enforcement Section in the remit of the Agency provide an appropriate opportunity to examine the role of

enforcement within the context of the compliance strategy and in fact within the Agency's overall strategy.

7.16 With regard to the work undertaken in respect of goods vehicles, buses and taxis, surveys could be undertaken to determine baselines levels of compliance across a range of activities. The significance of non-compliance should be assessed in terms of road safety, the environment and other key Agency aims. In addition, compliance levels could be compared against performance in other jurisdictions. Targets should be set for improvement and appropriate initiatives identified. In incorporating the work of Enforcement Section within an Agency wide compliance strategy it may be appropriate to review the existing funding arrangements, and to introduce a link between activities of the Section and the contribution that the activities make to Agency aims and objectives.

7.17 The introduction of reminders to owners of vehicles that are due for the MOT test raises the issue of what action will be taken in respect of those vehicle owners who ignore the reminder. It is likely that many of these people will be non-compliant. The reminder system presents an opportunity to initiate enforcement action. A database of records of vehicles that have not renewed their MOT could be created and used in a similar way to that used to detect vehicles that are not taxed. Motorists could then be advised that their vehicle was sighted on the road. Such a system would require working in close partnership with the DVLNI to ensure up-to-date information on vehicle ownership and vehicle owners names and addresses. The introduction of SORN would assist the accuracy of database information.

7.18 Such an approach would be a change of direction for the Agency and would require a number of factors to be addressed. For, example would the Agency advise the PSNI of cases where vehicles not tested were observed on the road and owners did not get the vehicle tested or would the Agency take on the role of prosecution. In GB consideration is being given to a body that will prosecute for all road traffic offences. The DOE intends to take over responsible for parking offences and it may be that the DVTA should explore some form of partnership arrangement for the purposes of detection and prosecution.

Key Tasks 2003 - 2006

- Encompass Enforcement Section activity within compliance strategy
- Develop systems to support and take follow-up action on vehicle test reminder system
- Consider action on DVLNI reminders for vehicle tests that are not acted on
- Consider DVTA role regarding prosecution of vehicle owners without valid MOT certificate
- Continue action to facilitate compulsory display of MOT disc
- Consider action required on non-compliance detected at roadside surveys
- Undertake examination of vehicle identification system carried out during testing process
- Amend the learner driver application form to specifically ask learners whom they are being instructed by e.g., family member/friend, Registered ADI
- Introduce display of ADI and Trainee licence during lessons to aid PSNI at roadside stops;
- Introduce procedure whereby illegal instructors are advised that the Agency has information to suggest that they may be providing instruction for reward and asking for written comments, follow-up action by PSNI.
- Random checks by District Examiners of insurance documents of suspected illegal instructors. If necessary write to insurance companies to advise them that the carrier of the documents is not a registered instructor – in case the suspect claimed that they were.

OBJECTIVE 6 - Research & development of methods to improve compliance

7.19 The development of a strategic approach to address the problem of low compliance requires an investigation of the causes and identification of the appropriate methods to achieve improvement. An initial survey undertaken as part of the development of this strategy found that 71% of certificates were not renewed before the old certificate expired. While levels of non-

compliance of this magnitude have serious implications for road safety and the environment the cost to the Agency in terms of lost revenue is not insignificant. Monitoring of the media and publications on driver and vehicle testing indicates that there is some evidence of non-compliance across the full range of Agency activity.

7.20 There is, therefore, evidence of non-compliance, particularly in respect of vehicle testing, and methods are being introduced to reduce this in terms of the reminder system and mandatory display of the MOT disc. While it will be necessary to establish the level of compliance across the range of Agency functions it will then be necessary to establish the best methods to address the problems e.g. financial incentives or penalties, changing the public's attitude to testing, and learning from testing systems in other countries. The many ways in which new technology can assist also needs to be explored

Key Tasks 2003 - 2006

- Develop and seek agreement on programme of research
- Monitor other policies such as re-test policy – zero tolerance, on the spot fines for no MOT Certificate, sequential certificates, combined MOT VED fee
- Consider methods of utilising test fees to support compliance e.g. higher test fees where certificate has expired, restrict certificate to date on which it would have expired had it been issued at the date the previous certificate expired.
- Undertake exercise to evaluate impact of non-compliance on road safety, environmental protection, finance etc. (lost/increased revenue)
- Undertake research to clarify the how vehicle defects contribute to accidents (ask PSNI to record secondary causes of accidents)
- Investigate the links between MOT non-compliance and vehicle crime
- Gather information on vehicle and driver testing in other countries
- Examine potential of new technology to assist in reducing non-compliance - developments in unambiguous electronic identification of a car, automatic number plate readers

OBJECTIVE 7 - The development of the skills, knowledge and motivation of staff

- 7.21 The main functions of the Agency will only be carried out effectively if there is a high level of compliance. It is important that not only is testing undertaken to a high standard but that all vehicles and drivers that require to be tested are in fact tested.
- 7.22 It is only through a joint effort that the problem of non-compliance will be addressed effectively. While there are some fairly obvious ways in which non-compliance can be reduced, those who set out to evade testing will continually seek out new ways of 'getting around' the regulations and the knowledge and ideas of all the staff to counter these could make a significant difference and contribute to a very successful strategy.
- 7.23 At an organisational level information will need to be collected and shared and procedures checked to ensure that there are no loopholes in the procedures that would allow those wishing to evade the system to succeed. The many initiatives identified in this strategy including the provision of information and guidance to customers, development of information systems, ensuring that systems are customer-friendly will require input from many staff.

Key Tasks 2003 – 2006

- Develop process for communication of compliance strategy
- Identify skills required for compliance initiatives e.g. roadside checks
- Check all systems and procedures for impact on compliance
- Develop procedures to involve all Agency staff in compliance e.g. focus group to generate ideas, identify and co-ordinate action on compliance