



DRIVER & VEHICLE TESTING AGENCY

2002 VEHICLE TEST EVASION

SURVEY

Compliance Section

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Key Results From The Vehicle Test Evasion Survey

- 1/ The number of vehicles of Vehicle Test age that did not have a Vehicle Test at date of sighting is 28.4% (Appendix 1)**

- 2/* Evasion rate increases amongst older vehicles with the average rate for vehicles between 1997 and 1992 at 21.5%, between 1991 and 1986 is 33.8% and pre 1986 vehicles is 69.3% (Appendix 2)**

- 3/* Evasion rate is highest on Class C Rural Roads and lowest on Class B Urban Roads (Appendix 3)**

- 4/ Of the vehicles which do not have a Vehicle Test, 42.8% were unlicensed and 57.2% were licensed (Appendix 4)**

- 5/* Evasion rate on weekdays is 24.2% and is 23.7% at the weekend (Appendix 5)**

- 6/ Potential loss of gross revenue as a result of evasion is £950,000.**

*** Figures derived from data matching process as described in Para. 3.15 and do not include some cases where vehicles were not compliant for a very short period**

VEHICLE TEST EVASION SURVEY

1 INTRODUCTION

Background

- 1.1 This survey was undertaken as part of the Agency's initiative to improve compliance with the Vehicle Test system. While it will form part of a broader compliance strategy the timing was influenced by the need to have factual evidence to support the Agency's Compliance Strategy.
- 1.2 The compliance strategy will address all areas of the Agency's responsibilities including vehicle testing, driver testing and the Approved Driving Instructor Scheme. It is intended that, in setting targets and objectives to achieve change, a baseline of current levels of compliance will be established in respect of all these areas.
- 1.3 This is the second of three surveys to be undertaken in respect of vehicle testing. Its purpose is to establish the percentage of vehicles on the road, which do not have a valid vehicle test certificate. The first survey, undertaken in October 2002, addressed the issue of vehicle test certificate renewal and the main finding in that survey was that 71% of vehicle test certificates are not renewed prior to expiry of the previous certificate. The third survey planned will include an investigation of the roadworthiness of vehicles being driven on public roads.
- 1.4 A recent survey by the Driver and Vehicle Licensing Agency, Northern Ireland (DVLNI) concluded that the evasion rate for vehicle excise duty (VED) is approximately 10% and that the cost to the economy may be as much as £13.7 million. There has been considerable speculation about the rate of Vehicle Test evasion but this is the first occasion that a detailed survey has been undertaken.

2 APPROACH

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

- initial consultation with Central Statistics and Research Branch (CSRB), DRD to confirm the validity of the methodology to be used and to determine the number of sightings needed to produce findings that would provide a satisfactory confidence level;
- creation of a centralised database of Vehicle Tests on computer;
- use of information received from the DVLNI June 2002 survey on vehicles sighted on the road over a three-week period at various locations across the province;
- validation of the centralised database and the DVLNI database against the DVTA MOT2 system, the DVLNI NIVIS system and manual records held in Armagh and Lisburn to assess the integrity of the information being used;
- analysis and documentation of findings; and
- further consultation with CSRB to validate analysis.

3 FACTFINDING AND ANALYSIS

Information Available in the Agency

3.1 The Agency carries out approximately 400,000 Vehicle Tests each year. Until the introduction of MOT2 each test centre, except Belfast, which had a computerised system, kept details of Vehicle Tests on a manual ledger. Some years ago, in order to assist in the search for details of tests, limited details were input to standalone computers. This developed to a situation where all test centres had information on computer and fortunately there was information on all the computers for the period required by this survey. By amalgamating information from the centre ledgers, and including information from the Belfast system, a useful repository of information on vehicle tests was developed.

3.2 The Agency keeps all the original Vehicle Test application forms and a copy of the pass or fail certificate in its Armagh and Lisburn test centres for all the centres using the old Vehicle Test system. Copies of certificates awarded under MOT2 are kept at the centre where the test took place. Information with regard to tests carried out under the MOT2 system is held on the ITL computer system.

DVLNI NIVIS System

3.3 The DVLNI maintains a database of all vehicles registered in Northern Ireland and information on the tax status of each vehicle on the NIVIS system.

DVLNI VED Evasion Survey

3.4 The information on vehicles sighted on the road for this survey was provided by DVLNI. As part of a major nationwide VED evasion survey DVLNI arranged for 54,000 sightings to be collected over a three-week period in June 2002 at 20 different locations. The information provided included date of sighting, registration mark of vehicle, year of registration, site location, and whether the vehicle had a valid VED licence. From the 54,000 records it was found that 28,000 vehicles were registered in 1998 or before. At the date of sighting only those vehicles registered before June of that year would have required an Vehicle Test certificate

Capture of Data

3.5 CSRB indicated that a sample size of 400 would be required in order to provide meaningful results and statistics show that a sample of 400 will provide a 5% statistical error rate. In order to provide us with some leeway, particularly as we expected to find that some of the vehicles registered in 1998 would prove to be less than four years old at the date of sighting, a sample of 625 records was selected.

Issues taken into consideration

- 3.7 The Vehicle Test ledger database is not a professionally designed system and has no validation checks for information input. Although the vast majority of the records were found to be accurate, there was the potential for incorrect entries. Some inaccuracies were easily spotted and rectified, for example, where the year was clearly wrong. There were possibly other inaccuracies; for example, a registration number could have been input incorrectly. It is unlikely that any computer system could avoid such mistakes. Also the information contained in the Vehicle Test ledger database relates to appointment dates given to vehicles for Vehicle Test. In some cases the vehicle may not have appeared for the test or it may have failed and not been presented for a retest.
- 3.8 In order to overcome these potential shortcomings an exercise was carried out to check the sample against the information held on manual records. The results of this exercise showed that the information on the ledger database was very accurate.

Analysis of Sample

- 3.9 The sample of vehicle sightings was checked against the vehicle test database ledger. Each record was examined to establish if it had a valid vehicle test certificate at the date of sighting.
- 3.10 There were no entries on the Vehicle Test database for some of the vehicles sighted. A further check was therefore carried out on the ITL system and this managed to identify some of these.
- 3.11 The information from DVLNI provided us with the year of first registration on the vehicles sighted. Some of the vehicles first registered in 1998 would not have required a Vehicle Test at date of sighting. A check, using the DVLNI NIVIS computer system, was used to identify the first registration date of all the vehicles. This procedure identified a small number of records that were first registered in the second half of 1998 and were therefore not appropriate for our sample. As a result our sample was reduced to 577 records, still well within the range to provide us with a sampling error level of plus or minus 5%.

3.12 The final procedure was to check records against manual records in order to validate the Vehicle Test dates held on the ledger database and to carry out year searches on the not found records. The exercise confirmed that the manual records corresponded to the ledger information.

Data Matching

3.13 While the sample of 577 records is sufficient to give a high level of accuracy in terms of the overall level of Vehicle Test evasion, it is too small to facilitate a meaningful break down by location, year of registration etc. An exercise was therefore undertaken to check all the sightings in respect of vehicles of Vehicle Test age against the test records.

3.14 This exercise involved selecting the sightings for vehicles of Vehicle Test age, selecting all the tests undertaken in the year before the dates of sightings, and inputting both to a database. A matching exercise was then undertaken to establish which vehicles sighted, appeared on the database of tests and which did not.

3.15 The limitations of the Vehicle Test database and the amount of time available for the task meant that some constraints had to be placed on the data matching exercise. As the sightings were recorded over three weeks the period covered by the tests, against which the sightings were checked, was extended by three weeks. Also, because the month of registration for the vehicles registered in 1998 was not known, and unlike the sample, it was not possible to check these individually, they were left out of the data matching. This means that those vehicles that were non-compliant for a short period may not been included in the data matching exercise.

3.16 The above limitations do not in any way impact on the estimated level of Vehicle Test evasion, which was derived from the sample of 577 records.

4 SURVEY RESULTS

Table 1 - Appendix 1

Vehicle Test Evasion Rate at date of sighting

	%	No of Records
Vehicles without a Vehicle Test Cert.	28.4	164
Vehicles with Vehicle Test Cert.	71.6	413
TOTAL	100	577

4.1 The calculations in the next four tables were carried out using the information obtained from the data-matching process. The wider timeframes used in the data-matching exercise resulted in less vehicles being identified as non-compliant (24.0%) and figures relating to these vehicles were used in the following analysis.

Table 2 - Appendix 2

Vehicle Test Evasion Rate Breakdown by Year

Year	%	Sightings	Non-Compliant Sightings
1997	20.5	3620	741
1996	21.5	3303	710
1995	20.2	2917	590
1994	22.2	2464	546
1993	21.1	1662	350
1992	26.9	1227	330
1991	26.1	902	235
1990	31.0	710	220
1989	36.9	488	180
1988	41.2	296	122
1987	47.9	165	79
1986	58.0	119	69
1985	65.8	76	50
1984	68.6	51	35
1983	69.0	29	20
1982	78.6	28	22
1981	52.9	17	9
1980	70.0	20	14
Pre 1980	75.5	53	40

Table 3 - Appendix 3**Non-Compliant Vehicles - Licensed/ Unlicensed**

	%	Non-Compliant Sightings	Total Non-Compliant Sightings
Licensed	57.2	2410	4211
Unlicensed	42.8	1801	

Table 4 - Appendix 4**Vehicle Test Evasion Rate By Road Type**

Type Of Road	%	Sightings	Non-Compliant Sightings
Motorway	22.8	2219	507
Class A Primary Rural	21.8	3760	820
Class A Non Primary Rural	25.3	3227	815
Class A Primary Urban	22.4	2322	519
Class A Non Primary Urban	21.0	1795	377
Class B Rural	27.5	3407	938
Class B Urban	19.9	452	90
Class C/Unc Rural	33.2	657	218
Class C/Unc Urban	25.3	308	78

List Of Locations

	Description	Road type	Road no.
1	M1 Blacks Rd - Saintfield Rd	Motorway	M1
2	Lurgan - Portadown	Class A Primary Rural	A3
3	Loughbrickland - Newry	Class A Primary Rural	A1
4	Foyle Bridge	Class A Non- Primary Rural	A515
5	Ballycastle - Cushendall	Class A Non- Primary Rural	A2
6	Castlewellan - Newcastle	Class A Non- Primary Rural	A50
7	Hollywood Bypass	Class A Primary Urban	A2
8	Cookstown Rd, Omagh	Class A Primary Urban	A505
9	Newtownards - Portaferry	Class A Non-Primary Urban	A20
10	M2 - Antrim	Class B Rural	B95
11	Coleraine - Portstewart	Class B Rural	B185
12	Junction with B47 Cookstown	Class B Rural	B162
13	Dungiven - Garvagh	Class B Rural	B64
14	Hillhall Rd - Lisburn	Class B Rural	B23
15	Ahogill	Class C/Unc Rural	-
16	East of Keady	Class C/Unc Rural	-
17	Tempo Off B80	Class C/Unc Rural	-
18	Groomsport	Class C/Unc Rural	-
19	Larne Junction with B152	Class B Urban	B120
20	Girona Avenue, Portrush	Class C/Unc Urban	-

Table 5 - Appendix 5

Non-Compliant Vehicles – By Day Of The Week

	%	Sightings	Non-Compliant Sightings
Weekend	23.7	6918	1640
Weekday	24.2	11229	2722

5 COMMENTS AND CONCLUSIONS

Overall rate of Vehicle Test evasion (Table 1 & Appendix 1)

5.1 The analysis shows that the overall rate of evasion in the Vehicle Test system is 28.4%. While this rate of evasion is high it is probably in line with expectations. At the time when the sightings were collected there was no specific form of Vehicle Test reminder other than the requirement to have a Vehicle Test certificate when applying for VED. The Vehicle Test disc was introduced at some test centres in late 2001 but no vehicle with an Vehicle Test disc would have been due its next test before the sighting dates.

Evasion by age of Vehicle (Table 2 & Appendix 2)

5.2 Analysis shows that an important factor in the rate of Vehicle Test evasion is the age of the vehicle, with an increasing rate of evasion among older vehicles. This follows a similar trend in VED evasion. The average rate of evasion for vehicles first registered between 1997 and 1992 is 21.5%, the average rate of those registered between 1991 and 1986 is 33.8% while the rate for vehicles older than these is 69.3%.

5.3 What should also be taken into consideration is the fact that a high percentage of vehicles on the road are less than ten years old. While the evasion rate is lower in respect of younger vehicles the number of vehicles is much higher with 74.2% of non-compliant vehicles in the survey less than ten years old. The fact that there are small numbers of older vehicles in the sightings means that the evasion rate for these may not reflect the true position and it is the trend that is more important.

Rate of evasion for licensed/unlicensed vehicles (Table 3 & Appendix 3)

5.4 The results of the survey show that of those vehicles that did not have a Vehicle Test certificate, 42.8% were unlicensed and 57.2% were licensed. Enforcement of the Vehicle Test scheme has for many years depended on the need to show a Vehicle Test certificate when applying for VED. This system is known to have shortcomings in that:

- A vehicle could have a valid VED disc but not have a Vehicle Test certificate
- VED evasion is estimated at 10%
- It is known that some vehicle owners tax their vehicles on forged Vehicle Test certificates.

5.5 While the 42.8% that were not licensed may be considered the responsibility of the DVLNI it is clear that only action by the DVTA will address the 57.2% that had a valid VED disc.

Evasion by road-type (Table 4 & Appendix 4)

5.6 The evasion rate, broken down by road-type, shows that the highest evasion rate is on the Class C rural roads and the lowest rate is on Class B urban. Caution should be exercised in drawing conclusions from these particular figures, as the number of sightings on these roads was relatively low.

Evasion by weekday/weekend (Table 5 & Appendix 5)

5.7 The analysis shows that there is practically no difference in the evasion rate of vehicles sighted on the road on weekdays as against those sighted at the weekend. The figures are 24.2% of non-complaint sighted on weekdays and 23.7% at the weekend. While there is probably no reason to believe that this should be a significant factor, at least we are aware of this for future work that may be undertaken.

Implications of Vehicle Test evasion

5.8

- Road Safety/Environment. The main concern with regard to the high rate of evasion is that, in all probability, those cars that evade the Vehicle Test are more likely to have mechanical defects than those vehicles that are tested. It is also likely to be the case that Vehicle Test evaders may be driving vehicles that are emitting damaging fumes into the environment. This is of course, while quite likely, an assumption and only a survey of roadworthiness at the kerbside would prove or disprove this.
- Loss of Gross Revenue. The current level of evasion is estimated to be 28%. 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 £950,000 for this year alone. This would allow fixed overheads, such as the cost of buildings, to be spread over more tests and may enable a downward thrust to be made on fees.

What is being done to improve compliance?

5.9 The Agency is taking forward a number of initiatives that should improve compliance with the Vehicle Test system. While some of these are being introduced with non-compliance in mind others are being introduced to improve efficiency or the service provided to customers. Initiatives include the Vehicle Test disc, which should act as a reminder to those owners who might otherwise forget that their vehicle was due its test. The new booking system for Vehicle Tests, presently being introduced by the Agency, will introduce new user friendly ways to book and pay for the test.

5.10 DVLNI have introduced Statutory Off-Road Notification (SORN), a scheme that will require each vehicle to be licensed for road use or be the subject of a declaration that it will not be used on the road. Introduction of this system should have a beneficial effect on Vehicle Test evasion and should prompt more owners to make sure that their certificates are renewed on time.

Initiatives that could be introduced

- 5.11 The compliance strategy, presently in draft form, outlines a number of potential initiatives to reduce non-compliance including:
- the use of follow-up reminder letters to let vehicle owners know that their vehicle test is due;
 - the use of a publicity campaign to convince people of the benefits of the Vehicle Test system;
 - a higher fee charged on a vehicle owner who without good reason does not renew the certificate on time;
 - a certificate issued could be restricted to the date on which it would have expired had it been issued at the date the previous certificate expired; and
 - a variant of this could be that, as happens in the ROI, the test is always due on the date of manufacture; this means that there is no advantage to the vehicle owner who delays renewal of the certificate.

6 THE NEXT STAGE

Targets for Improvement

- 6.1 In the Northern Ireland Road Safety Strategy 2002 – 2012, DVLNI set a target of 25% reduction in the evasion of PLG class vehicle excise duty (from 10% to 7.5%) by 2005.
- 6.2 In developing a target for reducing the evasion rate for Vehicle Test it may be appropriate to aim to reduce the overall evasion rate from the present 28% to 21% by 2005.
- 6.3 The compliance strategy has been developed in draft and the information from this survey should inform implementation of the strategy in identifying measures to enable this target to be achieved.