

REPORT

Investigation into the management of backlogs in driving licence applications

Department for Transport, Driver & Vehicle Licensing Agency

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Investigation into the management of backlogs in driving licence applications

Department for Transport, Driver & Vehicle Licensing Agency

Report by the Comptroller and Auditor General

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This report has been prepared under Section 6 of the National Audit Act 1983 for presentation to the House of Commons in accordance with Section 9 of the Act

Gareth Davies Comptroller and Auditor General National Audit Office

28 October 2022

Investigations

We conduct investigations to establish the underlying facts in circumstances where concerns have been raised with us, or in response to intelligence that we have gathered through our wider work.

We undertook this investigation in response to concerns raised by members of Parliament about delays and backlogs in the Driver & Vehicle Licensing Agency's processing of driving licence applications.

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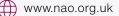
The National Audit Office study team consisted of:

Matthew Conroy, Catherine Hayes, Andy Nichols and Andy Whittingham, under the direction of Lee Summerfield.

For further information about the National Audit Office please contact:

National Audit Office Press Office 157–197 Buckingham Palace Road Victoria London SW1W 9SP

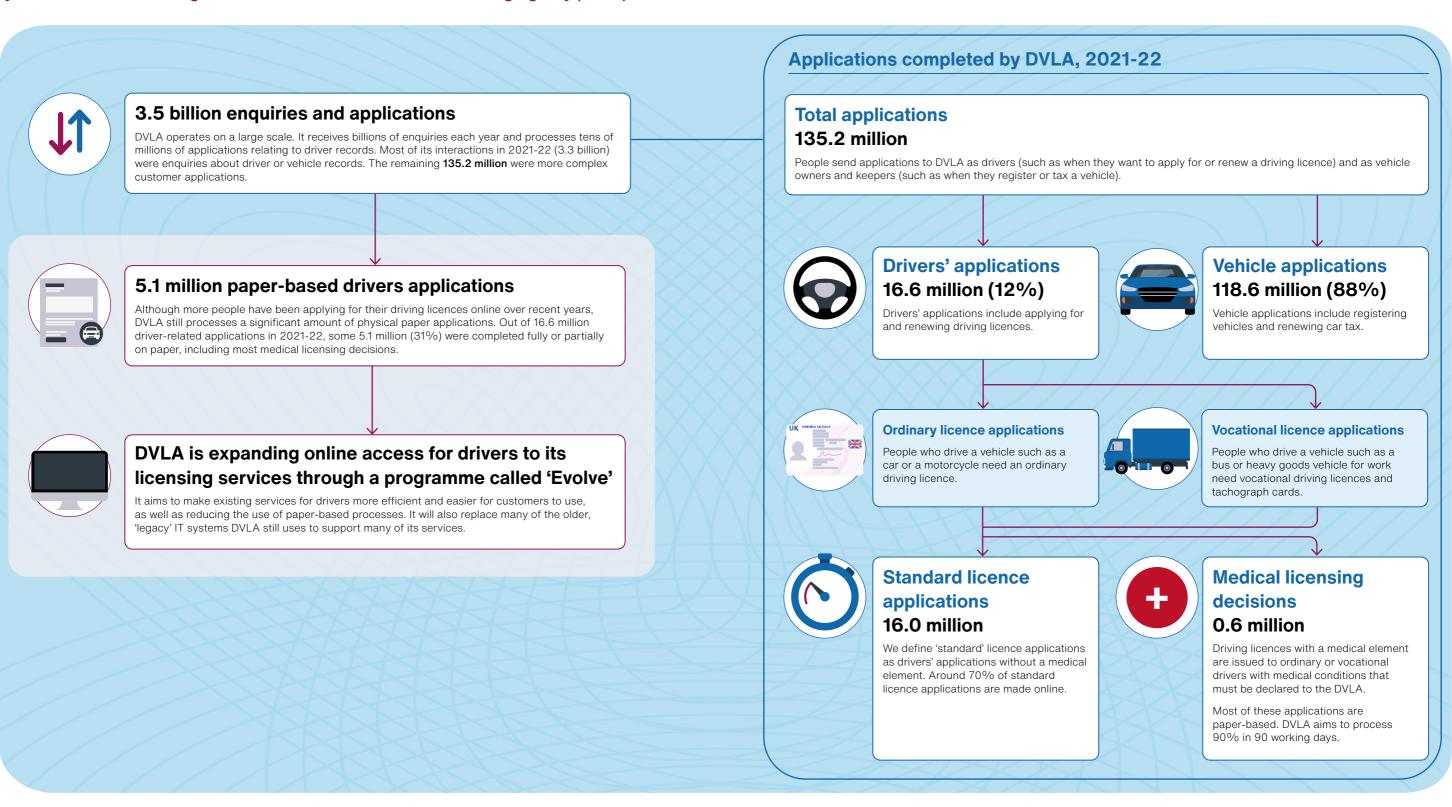
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Key information

Key information about driving licences and the Driver & Vehicle Licensing Agency (DVLA)



Summary

Introduction

1 The Driver & Vehicle Licensing Agency (DVLA), an executive agency of the Department for Transport, maintains around 50 million driver records in Great Britain and 40 million vehicle records in the UK. It also collects Vehicle Excise Duty (VED) on behalf of HM Treasury. It responded to 3.5 billion digital enquiries and customer applications in 2021-22. Of 135.2 million customer transactions DVLA completed in 2021-22, 16.6 million (12%) related to drivers, and 118.6 million (88%) related to vehicles.

2 People interact with DVLA about driving licences when they apply for their first licence, renew an existing licence, or when their circumstances change (**Figure 1** on pages 8 and 9). DVLA processes two main types of 'standard' licence, making up 96% of the 16.6 million driver-related transactions in 2021-22:

- ordinary driving licences 15.3 million (92%) of driver-related transactions in 2021-22; and
- vocational driving licences and tachograph cards, for individuals who drive a vehicle such as a bus or heavy goods vehicle (HGV) for work – 0.7 million (4%) of driver-related transactions in 2021-22.¹

3 Drivers must declare certain medical conditions to DVLA, or changes in such conditions, either when applying for or renewing a licence, or while driving on an existing licence. When a customer does so, DVLA assesses whether they can drive without putting themselves or others in danger. The medical licensing process can be more complex than other licensing decisions, and often relies on medical professionals providing additional information to DVLA. In addition to 16.0 million standard licence applications, DVLA processed around 581,000 medical licensing decisions in 2021-22, making up the remaining 4% of driver-related transactions.

4 Under current legislation (Section 88 of the Road Traffic Act 1988), customers with an existing driving licence waiting for DVLA to process a driving licence application or make a medical licensing decision may be able to continue to drive, provided they have made a valid application and their doctor or healthcare professional has not advised them against driving. DVLA signposts the provisions of Section 88 in letters to customers who are applying to renew their entitlement to drive and further information about Section 88 is available on the gov.uk website.

A tachograph records information on driving speed, time and distance to ensure drivers correctly follow laws on driving hours.

5 An increasing proportion of applications for driving licences are made online, but DVLA still processes a significant amount of physical paper applications: 31% of driver-related transactions in 2021-22 were completed fully or partially on paper, including most medical licence applications. DVLA staff input information from paper-based applications onto its systems and issue letters to the applicants and other parties to request information required to make licensing decisions. DVLA's current digital transformation programme aims to enable customers to access the majority of DVLA's drivers' services online within the next three to five years.

6 The COVID-19 restrictions introduced in March 2020 meant most staff could not work at DVLA's offices, affecting DVLA's ability to process applications (Appendix Two). Since then, DVLA has taken longer than usual to process driving licence applications from customers applying with paper documents or informing DVLA about medical conditions, leading to backlogs developing in parts of DVLA's driving licence operations. Calls to DVLA from customers making enquiries increased greatly, and the volume of complaints also increased.

Scope of this report

7 We carried out this investigation in response to concerns expressed by members of Parliament about the volume of correspondence they had received from constituents about their experiences of getting a driving licence. This report examines the delays and backlogs in driving licence applications that developed after April 2020, covering:

- the scale and nature of the delays and backlogs;
- their underlying causes;
- the scale of calls and complaints from customers; and
- DVLA's actions to manage and reduce the delays and backlogs.

8 We did not examine wider aspects of DVLA's role, such as its handling of vehicle registrations and records, or its collection of VED. The Comptroller and Auditor General (C&AG) reports annually on DVLA's collection of VED alongside his audit of DVLA's financial statements, most recently in July 2022.²

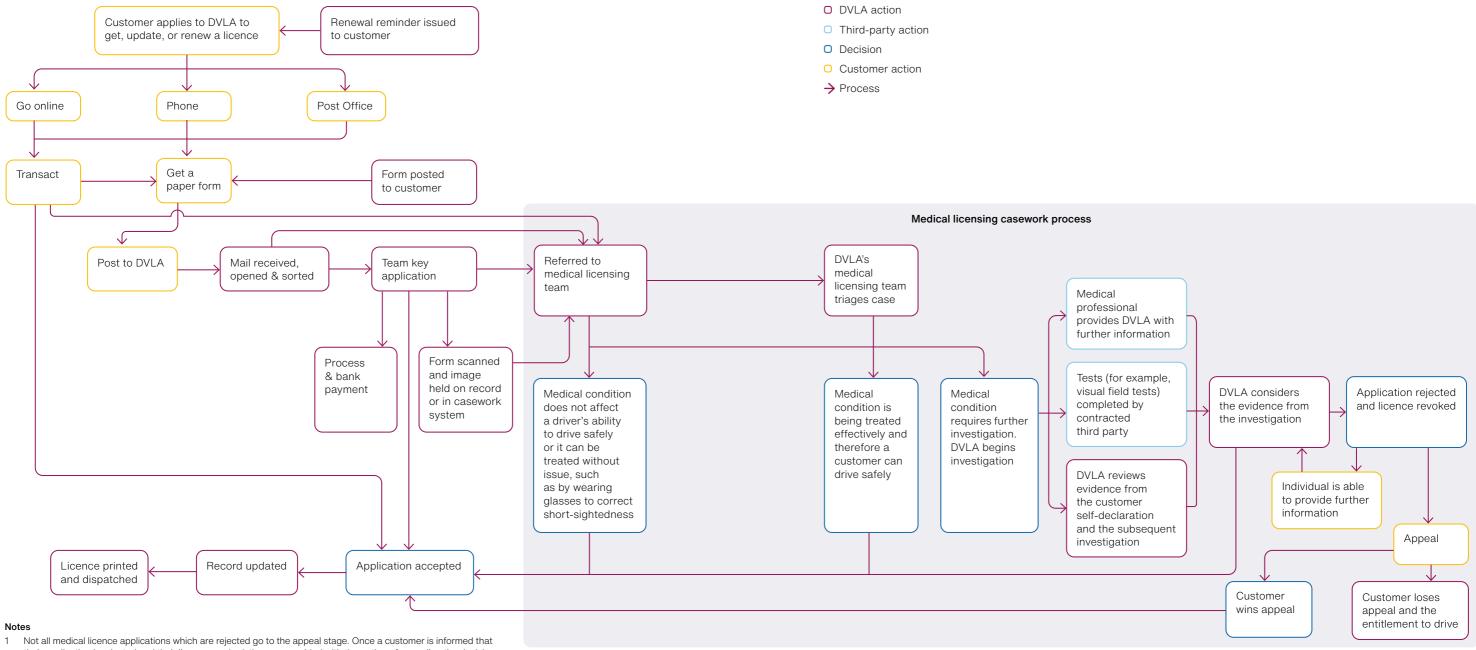
9 We conducted our fieldwork between June and September 2022. We reviewed documents, including DVLA's management information on driving licence processing, and papers describing its actions in response to the COVID-19 pandemic and the development of backlogs. We held interviews with officials in DVLA and the Department for Transport to discuss the areas in our scope and carried out on-site observations of transactions being processed.

² Driver & Vehicle Licensing Agency, Annual Report & Accounts 2021-22, July 2022, available at: www.gov.uk/ government/publications/dvla-annual-report-and-accounts-2021-to-2022

Figure 1

Overview of the driving licence application process for standard and medical licences, within the Driver & Vehicle Licensing Agency (DVLA)

Applying for a driving licence can be a simple process but paper-based applications can take more steps, while medical licencing decisions can be much more complex



- their application is rejected and their licence revoked, they are provided with the option of appealing the decision.
- 2 Customers can receive a paper form by either contacting DVLA via phone, accessing its website, or collecting a form from a post office.
- 3 Under current legislation (Section 88 of the Road Traffic Act 1988), customers with an existing driving licence waiting for DVLA to process a driving licence application or make a medical licensing decision may be able to continue to drive, provided they have made a valid application and their doctor or healthcare professional has not advised them against driving.

Source: National Audit Office analysis of Driver & Vehicle Licensing Agency data

10 We defined 'driving licence applications' as all transactions relating to driving licence records that can lead to a new licence being issued, work on the part of DVLA frontline staff, or a change to a driver's record. For example, applying for a first licence, renewing an existing licence, updating personal details, and advising DVLA of the development of (or changes related to) a relevant medical condition for DVLA to determine individual's fitness to drive. We also included applications for tachograph cards, which some drivers need in addition to a vocational driving licence to work legally. In some parts of the report, we present data relating to performance measures focusing on the number of applications processed within a set number of days to calculate these performance measures. DVLA uses a narrower definition of 'driving licence applications' than ours (Appendix One). This means that the numbers of applications presented in the context of performance reporting may not sum to the total number of driving licence applications for the same period presented elsewhere in this report.

Key findings

Scale of delays and backlogs in driving licence applications

11 Over the pandemic, DVLA continued to process most online licence applications within expected timeframes. Around 70% of driving licence applications are made online with the remaining 30% being paper-based. Ordinary driving licence applications make up the majority (96%) of online applications. Since April 2020, DVLA has met its aim of processing 95% of online ordinary driving licence applications within three working days of receipt in all but one month – May 2021 (paragraph 2.4).

12 DVLA was less able to process paper-based applications for driving licences, including applications with a medical element, while COVID-19 restrictions were in place, resulting in backlogs. The total number of driving licence applications in progress peaked at 1.1 million in September 2021, more than five times the average number in progress per month in 2019-20. Between April 2020 and September 2022, of the 24.3 million applications that DVLA completed, 3.3 million (13%) took longer than expected. The majority of these, 2.4 million (73%), were paper-based ordinary licence applications (paragraphs 2.3 and 2.5).

13 DVLA eliminated the backlog in paper-based standard driving licence applications in mid-2022, returning to processing applications within usual time limits by May 2022 and reducing the number in progress to typical levels by July 2022. DVLA usually expects to process 90% of paper-based standard licence applications within 10 working days. However, between April 2020 and September 2022, it achieved this level of performance in only eight out of 30 months, and overall around 52% of applications took longer than 10 working days to process. In July 2020, the number of standard applications in progress peaked at 504,000, compared with around 85,000 that DVLA would normally expect to be in progress at any one time. It reduced this to 73,000 by December 2020, but a second backlog then built up, and the number of applications in progress peaked at 836,000 in September 2021. By July 2022, DVLA had reduced the number of ongoing standard licence applications to 85,000 and eliminated the backlog (paragraphs 2.5 to 2.8).

14 Since March 2020, DVLA has not been able to make decisions on medical licence applications within its usual processing times. Around 89% of medical licence applications start on paper and many applications, including those that start online, involve further paper correspondence. DVLA expects to make 90% of medical licensing decisions within 90 days, but DVLA's performance dropped below this in March 2020. DVLA suspended this measure as a formal target for 2020-21 and 2021-22 due to the impact of the COVID-19 pandemic on its operations and on medical professionals' ability to respond to DVLA's requests for information. Between April 2020 and September 2022, of the medical licensing decisions that DVLA made, 36% took longer than 90 working days, with 6% taking longer than 250 working days (paragraphs 1.7, 2.9, 2.11, 2.12 and 2.26).

15 By February 2022, DVLA had 333,000 medical licence applications in progress, three times the average number in progress during 2019-20. Before March 2020, DVLA had on average 106,000 ongoing applications from drivers with medical conditions. After March 2020, the number of ongoing medical licensing applications built up, averaging 144,000 in 2020-21 and 274,000 in 2021-22. The number of ongoing applications peaked in February 2022 at 333,000. Since then, DVLA has cleared on average 17,700 more applications per month than it has received, reducing the number of ongoing applications to around 207,000 at the end of September 2022. DVLA was aiming to reduce the number of ongoing applications to 120,000 or fewer by September 2022 but is now aiming to achieve this by December 2022 or January 2023 (paragraphs 2.11 and 2.12). Causes of delays and backlogs in licence applications

16 DVLA's ability to process paper-based applications was reduced during the COVID-19 lockdowns as fewer staff were able to work at its site in Swansea. DVLA's operational processes for handling paper-based applications were designed around staff being on site, to handle physical paper or to access scanned paperwork using IT systems that were not designed for remote working. DVLA's on site workforce capacity was reduced between April and August 2020 to comply with COVID-19 restrictions introduced in April 2020. The number of staff working on site before the COVID-19 pandemic was around 3,300. During the first lockdown from March 2020 the number on site fell to under 1,000 at any one time, up to June 2020. DVLA's workforce included many individuals with caring responsibilities and 1,050 people who were vulnerable, including people with underlying health conditions that put them at greater risk of severe illness from COVID-19 (paragraphs 1.9 and 2.20 to 2.23).

17 Some of the delay in making medical licensing decisions was caused by difficulties in obtaining medical information from doctors and other medical professionals. In addition to a lack of staff capacity on site due to COVID-19 restrictions, official guidance issued by the British Medical Association and the Royal College of General Practitioners in March 2020 advised GPs to pause requests for medical information from DVLA and prioritise work essential for maintaining public health. Later guidance advised GPs to take into account the prevalence of COVID-19 in their local areas when prioritising work, and to respond to information requests from DVLA related to essential workers, such as lorry and bus drivers. Customers were also less able to access vision and other tests commissioned by DVLA from medical specialists because businesses were in lockdown or were experiencing problems related to the pandemic. In addition, staff capacity within DVLA was reduced because of industrial action between April and August 2021, with staff dealing with medical licensing decisions taking part in 33 days of industrial action (paragraphs 2.25 to 2.28, and 2.30).

18 In February 2020, DVLA modelled the impact of COVID-19 on its services, but it had not anticipated the scale and length of disruption that the COVID-19 pandemic and the government response to it would cause. DVLA undertook an exercise in February 2020 to model the possible impact of COVID-19. Through the exercise DVLA understood that staff being off site would lead to backlogs in paper-based licence applications, but it did not anticipate the level of sustained disruption from COVID-19 restrictions on its ability to process paper-based applications at its main Swansea site (paragraph 3.2).

Customer calls and complaints

Calls from customers about their driving licence applications increased around 19 sixfold over the pandemic, but DVLA had fewer staff to answer them, which led to very high numbers of unanswered calls. The number of calls to DVLA's contact centre relating to driving licences increased from around 442,000 per month prior to April 2020 to an average of 1.8 million per month during 2020-21 and 3.5 million calls per month during 2021-22. Calls to DVLA peaked in July 2020 at 5.5 million. The number of telephone calls DVLA's contact centre answered each month fell significantly from around 370,000 calls per month before the pandemic to an average of around 157,000 per month over 2020-21 and 129,000 per month over 2021-22. Consequently, high numbers of calls were not answered, peaking first in July 2020 at around 5.4 million, and again in June 2021 at around 5.6 million. Since then, the number of calls to DVLA has been dropping, to around 345,000 in September 2022, below the pre-pandemic average. DVLA expects call volumes to stay below pre-pandemic levels as customers have switched to online communication channels. At the same time the number of unanswered calls has been dropping, to 25,000 in September 2022, 7% of calls received. The number of unanswered calls does not represent the number of individual customers whose calls were not answered as many customers made multiple attempts to call (paragraphs 2.14 to 2.16).

20 The number of complaints to DVLA increased from 4,300 in 2019-20 to almost 32,000 in 2021-22. In 2019-20, DVLA received around 4,300 customer complaints either directly or via customers' MPs, which increased to 12,300 complaints in 2020-21 and to more than 31,900 in 2021-22. At the same time the proportion of complaints DVLA received via MPs increased from 60% in 2019-20 to 84% of all complaints in 2021-22. Despite medical licence applications accounting for only 0.4% of all DVLA's transactions that year, 52% of complaints in 2021-22 related to these applications (paragraphs 1.6, 2.17 and 2.18).

DVLA's actions to manage delays and backlogs in driving licence applications

21 Since April 2020, DVLA has prioritised certain applications and customers according to need and the resources it had available. Between April and June 2020, DVLA prioritised working on paper-based applications for HGV and bus drivers' vocational driving licences. It largely paused work on paper-based applications related to other driving licences as staff were unable to process these from home. As the number of DVLA staff able to work on site increased, it reintroduced more services. Currently, to bring down the remaining backlog in the medical licence applications, DVLA is working on older applications alongside incoming applications, aiming to balance these two priorities based on the capacity and capability of the staff it has available, rather than focusing exclusively on the oldest applications (paragraphs 1.4, 3.3 and 3.5).

22 DVLA allowed standard licence holders to delay renewing their licence to reduce overall demand on its services. From June 2020, DVLA implemented changes to allow drivers to delay renewing their photocard driving licence by up to 11 months and allowed vocational licence holders a one-year extension to the usual requirement to undergo a medical examination by a doctor every five years from the age of 45 (paragraph 3.10).

23 DVLA increased the number of staff able to work remotely during 2020 and 2021 but this did not include most staff working on paper-based licence applications or processing customers' medical information. The number of DVLA staff working from home increased from around 1,400 in April 2020 to around 2,000 by the end of 2020, as more were issued with laptops. However, DVLA does not allow most staff working on paper-based applications or processing customers' medical information to work remotely because of high data security risks. DVLA assesses the risks associated with staff handling customers' original identity documents and accessing customers' medical information at home to be too high for remote working to be possible (paragraphs 3.13 to 3.15).

24 DVLA has temporarily expanded the size of its estate and increased the number of staff able to work safely on site, to increase the capacity and resilience of its processing of paper-based licence applications. Starting in April 2020, DVLA rearranged its main office site in Swansea to comply with safety requirements and to free up space for operational staff, at a cost of \pounds 1.2 million. It developed a longer-term plan to acquire new office space and increase staff capacity through a combination of shift work, overtime payments, and recruitment. These plans evolved over time, and DVLA built in extra capacity to provide resilience against changes in COVID-19 infection levels and government guidance. An amended final business case in October 2021 approved expenditure of up to £37 million, covering the costs of: renting and preparing two new offices in Swansea and Birmingham; recruiting more than 400 additional staff (full-time equivalent basis) funded until March 2023; and making overtime payments to staff. DVLA is now planning to spend £34 million over four years. It had spent £24 million up to September 2022. DVLA considers the additional office space will provide resilience against any future restrictions (paragraphs 3.4 and 3.6 to 3.9).

25 DVLA is expanding online access for customers to its licensing services.

In 2019, DVLA began a digital transformation programme, 'Evolve'. The programme aims to make existing services for drivers more efficient and easier for customers to use, as well as reducing the use of paper-based processes. In response to the backlogs, DVLA brought forward several changes from its digital transformation programme, including the introduction in July 2021 of a new online service for provisional driving licence applications, which it estimates has reduced paper-based applications by around 20,000 per month (paragraphs 1.9, 3.11 and 3.12).