

<b>Title:</b> Review of language support provided for driving tests. <b>IA No:</b> DfT00188 <b>Lead department or agency:</b> Driving Standards Agency <b>Other departments or agencies:</b>	<b>Impact Assessment (IA)</b>		
	<b>Date:</b> 01/10/2013		
	<b>Stage:</b> Final		
	<b>Source of intervention:</b> Domestic		
	<b>Type of measure:</b> Other		
<b>Contact for enquiries:</b> Policy Unit, Driving Standards Agency  e-mail - consultations@dsa.gsi.gov.uk			
<b>Summary: Intervention and Options</b>			<b>RPC Opinion:</b> Not Applicable

Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, Two-Out? Measure qualifies as
£-221.7m	NQ	NQ	No   NA

**What is the problem under consideration? Why is government intervention necessary?**

There are currently drivers successfully passing their driving test who do not speak English or Welsh. There could be implications for road safety, as such drivers are unlikely to understand non-pictorial road signs and other information that is available to road users. This situation arises partly as a result of the current arrangements for theory and practical tests, which allow voiceovers in 19 languages, other than English or Welsh, and the use of interpreters on test. This also leads to greater opportunity for fraud, as interpreters can assist candidates. If tests were only available in the national language, there would also be an incentive to learn English or Welsh which would lead to more opportunities for social integration.

**What are the policy objectives and the intended effects?**

To reduce the risk to road safety, remove fraud and encourage social cohesion. These aims can be realised by making changes to deliver driving tests in English and Welsh only. This will require all drivers taking a test to understand the national languages and help them to understand non-pictorial road signs and other instructions when driving. It is expected that better understanding will improve their safety and that of other road users. This will also reduce the opportunities available for those wishing to take a test dishonestly, by removing the possibility of an interpreter giving instruction on test. It is anticipated that learning the national language will also aid social integration for those new to Great Britain.

**What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)**

As the legislation does not specify the language for conducting tests, this is a non-regulatory change. The current system of providing the driving test with voiceovers and allowing interpreters has grown as an administrative arrangement over time. We consulted on making the change and followed similar processes as we would if we had been consulting on making regulation. In addition to retaining the current system, the options we considered were: Option 1 - cease to provide voiceovers in languages other than English or Welsh on the theory test, or interpreters on the theory and practical test. Option 2 - cease to provide voiceovers in languages other than English or Welsh on the theory test, but retain the use of interpreters on all tests. Option 3 - cease to provide interpreters on all tests but retain the use of voiceovers in all current languages at the theory test. Option 1 is the preferred option as it allows for the full benefits of improving road safety and encouraging social cohesion to be realised.

**Will the policy be reviewed?** It will be reviewed. **If applicable, set review date:** 01/2019

Does implementation go beyond minimum EU requirements?			Yes / No / N/A		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	<b>Micro</b> Yes	<b>&lt; 20</b> Yes	<b>Small</b> Yes	<b>Medium</b> Yes	<b>Large</b> Yes
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)			<b>Traded:</b> N/A	<b>Non-traded:</b> N/A	

**I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs.**

Signed by the responsible Minister: Stephen Hammond Date: 1 October 2013

# Summary: Analysis & Evidence

# Policy Option 1

**Description:** Remove voiceovers and interpreters from all theory and practical tests

## FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year 2013	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -501.4	High: -51.9	Best Estimate: -221.7

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0.0	6.4	54.7
High	0.0	58.7	504.2
Best Estimate	0.0	26.1	224.5

### Description and scale of key monetised costs by 'main affected groups'

Drivers - The average annual cost to drivers has been estimated at around £6 to £58 million per year, with a best estimate of around £26 million per year. This comprises around £0.8 to £22 million per year for the financial cost of undertaking language training with a best estimate of around £8 million per year, and around £5 to £34 million per year for the value of the time required to learn the language on average with a best estimate of around £17 million per year.

### Other key non-monetised costs by 'main affected groups'

Businesses – 1) Loss of income to theory test contractors/interpreters. Non-monetised cost as it is impossible to quantify how much would be offset by other activities. 2) Reduced opportunities to employ non-national language speaking drivers - increase business costs, especially where language unimportant. Drivers - Inconvenience of learning English/Welsh and delay in taking driving test. Road users - Could impact on road safety if unintended effect to encourage unlicensed driving – addressed in consultation.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	0.3	2.8
High	0	0.3	2.8
Best Estimate	0	0.3	2.8

### Description and scale of key monetised benefits by 'main affected groups'

Drivers - estimated at around £0.2 million a year from no longer paying for interpreters. Public sector - estimated at around £0.1 million a year from DSA not being required to investigate fraud arising from communication to candidates by their interpreters. This may be offset by an increase in unlicensed driving. But it is impossible to estimate with any accuracy the number who may decide to do so and the amount cannot be monetised.

### Other key non-monetised benefits by 'main affected groups'

DSA - Moderate saving from no longer paying for voiceovers (unable to include figures as would undermine commercial confidentiality of tender exercise for new theory test contract). Road users - improved road safety as more drivers likely to understand non-pictorial information when driving. Non-English/Welsh speaking drivers - learning national language expected to increase employment and assist engagement within community, improving longer term social cohesion.

### Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

1.) Given limitations of available evidence, not possible to monetise all costs and benefits. Full qualitative description provided in evidence base. 2.) Estimates sensitive to assumptions made, including proportion of candidates who need to learn English/Welsh and proportion taking language training. 3) Number of expected unlicensed drivers not high enough to erode road safety/fraud benefits identified. 4) Number of people taking driving tests remains constant.

## BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:	In scope of OITO?	Measure qualifies as
Costs: Benefits: Net:	No	NA

# Summary: Analysis & Evidence

# Policy Option 2

**Description:** Remove voiceovers but retain the use of interpreters on all theory and practical tests

## FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period	Net Benefit (Present Value (PV)) (£m)		
			Low: -91.34	High: -45.67	Best Estimate: -68.50

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0	5.3	45.7
High	0	10.6	91.3
Best Estimate	0	8.0	68.5

### Description and scale of key monetised costs by 'main affected groups'

Drivers - The cost to drivers has been estimated at around £5 million to £10 million per year with a best estimate of around £8 million per year. This is the estimated cost to making use of an interpreter on the theory test, rather than using the voiceovers, which were provided without charge.

### Other key non-monetised costs by 'main affected groups'

Theory-test contractor - Loss of income shown as non-monetised cost as impossible to quantify how much offset by other activities. DSA - Voiceovers pre-recorded and, in contrast with arranging for interpreter, convenient to provide – this benefit lost by change. 3.) Scope for fraud increased, rather than diminished, by moving from voiceovers (which are secure) to interpreters (which are less secure, as there is potential for instructions to be given to the candidate).

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	0	0
High	0	0	0
Best Estimate	0	0	0

### Description and scale of key monetised benefits by 'main affected groups'

No monetised benefits identified.

### Other key non-monetised benefits by 'main affected groups'

DSA - Moderate saving from no longer paying for voiceovers (unable to include figures as would undermine commercial confidentiality of tender exercise for new theory test contract). Drivers - Compared with current arrangement, there would be no benefit to learner drivers from this option – instead of using a voiceover, individuals would be likely to employ an interpreter at a small extra cost – see the section on Costs To Drivers above.

### Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

1.) Given limitations of the available evidence base, not possible to monetise all costs and benefits identified. Full qualitative description provided in evidence base. 2.) Estimates sensitive to assumptions made, including proportion of affected candidates who would use interpreter. 3) Number of people taking driving tests remains constant.

## BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:			In scope of OIOO?	Measure qualifies as
Costs:	Benefits:	Net:	No	NA

# Summary: Analysis & Evidence

# Policy Option 3

**Description:** Remove interpreters but retain the use of voiceovers on theory test

## FULL ECONOMIC ASSESSMENT

Price Base Year	PV Base Year	Time Period	Net Benefit (Present Value (PV)) (£m)		
			Low: -152.4	High: -4.4	Best Estimate: -51.2

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	0	0.7	6.4
High	0	17.0	154.4
Best Estimate	0	6.2	53.2

### Description and scale of key monetised costs by 'main affected groups'

The average annual cost to drivers has been estimated at around £0.7 million to £17 million per year, with a Best estimate of around £6 million per year. This comprises around £0.3 million to £8 million per year for the financial cost of undertaking language training with a best estimate of around £3 million per year, and around £0.5 million to £10 million per year for the value of the time required to learn the language on average with a best estimate of around £3 million per year.

### Other key non-monetised costs by 'main affected groups'

Business - Loss of income for no longer providing interpreters (non-monetised - impossible to quantify how much offset by other activities). Non-English/Welsh speaking learner drivers - 1.) Inconvenience of learning national language before practical test and 2.) where voiceover not available in candidate's language. 3.) Possible increase in unlicensed driving (addressed in consultation). 4.) Inability of some, who have been unable to take the test, to apply for jobs as drivers.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0	0.2	1.9
High	0	0.2	1.9
Best Estimate	0	0.2	1.9

### Description and scale of key monetised benefits by 'main affected groups'

Non-English/Welsh speaking learner drivers - The benefit to drivers is estimated at around £0.2 million a year from no longer paying for interpreters.

### Other key non-monetised benefits by 'main affected groups'

Non-English/Welsh speaking learner drivers - It is anticipated that improved road safety will result from the change, as more drivers would be expected to understand English or Welsh and therefore non-pictorial road signs and other information made available when driving. We also expect that learning the national language would make available greater employment opportunities and facilitate engagement within local communities, resulting in longer term social cohesion.

### Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

- Given limitations of available evidence base, not possible to monetise all costs and benefits identified. Full qualitative description provided in evidence base.
- Estimates sensitive to assumptions made, including proportion of affected candidates who would learn English/Welsh and take language training.
- Risk that candidates who use voiceovers will not pass practical test – negate benefit of retained voiceover.
- Do not expect number of unlicensed drivers to erode benefits.

## BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:			In scope of OIOO?	Measure qualifies as
Costs: 0	Benefits: 0	Net: 0	No	NA

# Evidence Base (for summary sheets)

## 1. Background

### Multi-language voiceovers

1. Driving tests in the UK are carried out by the Driving Standards Agency (DSA), which is an executive agency within the Department for Transport. The nature of the driving test taken by candidates seeking to obtain a full driving licence is largely dictated by European legislation. The driving test is split into two parts - a theory test followed by a practical, on-road test. It is a condition of the EU legislation that a candidate must take and pass the theory test before they can progress to take the practical test.
2. The theory test is a computer based exam, consisting of multiple choice questions and a video-based hazard perception test. The instructions for completing the test, the questions and response options are presented in English and in Wales they can also be shown in Welsh.
3. DSA has also provided learner car drivers and motorcycle riders with pre-recorded voiceovers for the computer-based theory test in nineteen different foreign languages. Tests are also available with voiceovers in English and Welsh, to assist those with dyslexia or other learning difficulties, who may not otherwise be able to read the written questions and answers.
4. The practice of providing voiceovers for car and motorcycle tests has grown as an administrative arrangement since delivery of the theory test was computerised in 2000. A voiceover facility was introduced at the same time and the number of available languages has gradually increased, based on demand. The legislation that underpins driving test requirements - which is EU-based - concerns safe and competent driving, not language skills. Whilst there is no legal requirement for a driving test candidate to be proficient in English or Welsh, neither is there a legal requirement for tests to be delivered in non-national languages.
5. There are no voiceover facilities (other than English and Welsh) for the theory test taken by learner lorry and bus drivers or for those taking the Initial Qualification theory test for the Driver Certificate of Professional Competence or for the Approved Driving Instructor theory test.

### Interpreters

6. DSA permits the use of interpreters in theory and practical tests taken by car, motorcycle, lorry and bus candidates.
7. The interpreter for the practical test must be over 16 years of age, and can be a qualified interpreter, the candidate's driving instructor, a friend or family member. In some instances the interpreter only intervenes if the candidate has difficulty understanding a specific instruction, such as that for the reverse parking exercise. In other cases, however, he or she translates each instruction and direction given by the examiner.
8. In 2011/12, of 1.57 million practical driving tests, some 35,000 were conducted with an interpreter present, including retests. 19,555 individuals asked for tests with an interpreter.
9. Interpreters for the theory test must satisfy slightly different criteria; they must be approved by the DSA, be of working age and cannot be a family member or the candidate's driving instructor. Interpreters are normally provided in situations where a voiceover is not available in a candidate's native language, or where the candidate speaks a dialect that would make understanding of the voiceover difficult.
10. In 2011/12, of some 1.5 m theory tests, the following were delivered with language assistance.

<b>With interpreter present</b>	<b>With voiceover</b>		
	<b>Total</b>	<b>English/Welsh</b>	<b>Other languages</b>
2,262	258,314	152,202	106,112

11. However, these figures represent total tests, including re-tests. 57,361 candidates requested non-English or Welsh voiceovers and 1,690 requested a test with an interpreter.

## **2. Problem under consideration**

12. There are drivers coming through the qualification process, and receiving licences to drive in Great Britain, who are not conversant with English or Welsh. This is as a result of provision of foreign language voiceovers and allowing interpreters to take part in driving tests – which formed part of a socially inclusive approach to delivering driver testing services. There could be implications for road safety, as such drivers may not be sufficiently competent in English or Welsh to read non-pictorial traffic signs and other information while driving and would not, without assistance, be able to take action on emergency road notices. This lack of knowledge of pertaining road conditions could affect driver behaviour and mean that different drivers may take different action when approaching the same set of conditions.

13. Ministers are also keen to encourage better social integration and engagement in wider societal activity. It is likely that improved understanding of the national language would equip those new to Great Britain with skills to integrate fully. This could improve opportunities for obtaining employment.

14. A report by the Commission on Integration and Cohesion, “*Our Shared Future*” published 14 June 2007, identified three concerns about the translation of written materials into community languages:

a). That local residents who don’t speak English might rely on materials being available in translated form, rather than seeking opportunities to improve their language skills.

b). That however well intentioned, continued translation into a multitude of languages might enforce barriers between communities, rather than emphasising commonalities and developing a sense of a “shared future”.

c). And that if materials are translated, with no English in them at all, settled communities might be concerned about new migrants being offered unjustified additional or preferential services.

15. In addition, our experience is that the presence of interpreters has created an opportunity for cheating at theory test. Over a three year period from 2009 to 2012, 9 individuals were removed from the list of approved interpreters and 861 individuals’ test pass certificates were revoked. The measures we have in place to police this, such as reviewing recordings of translation from theory test centres, are expensive and time-consuming. The average cost of each interpreter investigation is approximately £10,000.

16. There are consequences for road safety, if action is not taken to prevent fraudulent acquisition of driving licences. There would be likely to be more drivers on the road who had not legitimately completed the qualification process. These individuals would not have the necessary skills to drive competently. This is likely to result in increased danger to road users.

17. Whilst road safety can be influenced by a variety of factors, such as vehicle design and different attitudes to driving, there is potential for improvements for all drivers from greater understanding of road signs and other information, which could result in a reduction in accident rates and fatalities and a knock on effect of reduced costs of provision of emergency and medical services. Further information on the benefits to society of preventing accidents and guidance on appraising accident impacts is available at the following link <http://www.dft.gov.uk/webtag/documents/expert/unit3.4.1.php>.

## **3. Rationale for intervention**

18. Ministers tasked DSA with conducting a review of foreign language service provision to determine whether there is value in moving to an arrangement where tests are delivered only in national languages (English and Welsh).

19. The main reasons for the review are outlined in Section 2 – concerns about road safety, social cohesion and fraud. At present, when a candidate has passed the driving test, he is free to drive unsupervised without an understanding of English or Welsh. The road safety implications that may result from this may include not being able to understand non-pictorial road signs, not reacting to emergency road notices and lacking the same level of knowledge about pertaining road conditions as other drivers.

By removing such language support, steps would be taken to ensure that all drivers who passed their test in Great Britain were fully equipped to deal with road and traffic conditions.

20. In addition, it is considered that there may be a benefit for social cohesion by removing language support in that this could encourage candidates to learn the national language, which may help employment opportunities and lead to increased participation in the wider community. Removing the use of interpreters would also reduce the situations where fraud could be committed.

21. Whilst it is not possible to obtain a proven link between the language in which a test is conducted and road safety, the responses to the consultation exercise which we undertook (see below under "Consultation") identified a significant concern about this issue among public opinion. It is, in any case, not straightforward to identify causality in road accidents, in view of the different contributing factors – such as vehicle design, safety initiatives in particular areas (such as speed cameras or road humps) and driver attitude.

22. Existing licence holders from Member States are legally allowed to drive anywhere within the EU, including GB and NI, in a vehicle for which they hold an existing driving entitlement. There is no requirement for those drivers to speak English or Welsh. Similarly, a GB citizen driving in mainland Europe may not be able to understand signs and directions given in other languages. There are no proposals to restrict full licence holders from driving on the basis of language skills.

#### **4. Consultation**

23. The consultation was undertaken between February and April 2013. There were 1,996 responses. Those responding included driver trainers, bus companies, representatives of trade unions and small businesses.

24. The proposal to withdraw all language assistance, received support from the majority of those who responded. There were recurring points in favour throughout the responses, with a strong view emerging that to be able to drive in Britain an individual should be able to understand the national language.

25. A significant theme was road safety. Many agreed that a lack of understanding of the national language meant that some drivers may not be able to understand road signs, converse with traffic enforcement officers or read details of the rules of the road. Others were concerned about the potential for the interpreter to give the candidate instructions during the test. There was also support for the aim of promoting social cohesion, through encouraging candidates to learn the national language, and for the potential savings to DSA from no longer paying for voiceovers.

26. Views expressed by those who wished to retain language support included that there is no evidence that the current procedures are unsafe and that most road signs are language-neutral because they are pictorial. The point was made that Britain is a multicultural society with sizeable numbers speaking languages other than English or Welsh. British drivers are also allowed to drive elsewhere in Europe, without necessarily speaking the native language, under arrangements applying to all EU member states.

27. There was also concern that, if language support was not available, candidates from other EU member states may return to their own country to pass the test. This may be a more straightforward route to a community model driving licence, which could be used to drive in Britain. This was considered by some to be less conducive to road safety than passing a test in British road and traffic conditions, albeit one with language support.

28. There were also comments about the time to learn English or Welsh. These are considered under "Costs of Option 1".

## 5. Social cohesion

29. There is some evidence of wider societal benefits<sup>1</sup> of learning the language, which could lead to greater social integration between communities. There was support for this in the consultation. Please also see the Equality Impact Assessment later in this IA.

30. There were few direct examples with which to inform the review. However, we identified two contrasting situations where the use of language has been addressed elsewhere in the world. These highlight different approaches to promoting the use of a language by the state and how the national language is learned. These offer useful background when reviewing our approach to this issue.

### Singapore<sup>2</sup>

31. In 1979, in Singapore, the government introduced a “speak Mandarin” campaign, which discouraged the use of local dialects. The effect has been successful in terms of those speaking Mandarin. The use of Chinese dialect at home dropped from 81.4% in 1980 to 30.7% in 2000. Meanwhile, households that claimed to use Mandarin as the dominant language at home increased from 10.2% in 1980 to 35% in 2000.

32. However, the campaign has not been universally welcomed. One view is that the campaign has threatened ties within families, as older generations may not speak Mandarin. Another is that many younger generations are unable to communicate with non-Mandarin speaking grandparents.

33. Whilst the “speak Mandarin” campaign is not entirely equivalent to the withdrawal of language support – one discouraged the use of certain languages in society, whereas the other simply requires the use of the national language for particular activities – there are issues deriving from the first which could be useful. Primarily, it is important to avoid discouraging the use of mother tongues within ethnic groups, thereby destroying communication within family groups. In essence, cultural diversity must be respected as the review is progressed.

### Finland<sup>3</sup>

34. It is also possible that focussed education can support a wider knowledge of the national language. An example of a country where this applies is Finland, where children receive intensive instruction in the national language from an early age and, at age four, can spend 25 hours a week with others learning the language with a teacher and teaching assistant. Only when they have mastered Finnish, which can take between six months and a year, are they put into their year groups.

35. The approach in Finland does not, however, discourage the use of other languages. In fact, there is encouragement for the use of non-Finnish mother tongues. According to the Guardian “Helsinki’s education department estimates that just over 11,000 pupils – almost 2% - have state funded tuition in a mother tongue that isn’t Finnish, before or after their other classes”.

36. In addition, Finland has had a “positive discrimination” policy since the 1990s, where schools are given extra funds, which the teachers decide how to spend, if they are situated in relatively poor areas - this is topped up with the equivalent of £875 or each child who has lived in Finland for less than four years.

## 6. Policy objective

37. The intention is that this policy will incentivise non-English or Welsh speakers to learn the national language in order to enhance road safety and improve the opportunities available to those who do not speak English or Welsh, in terms of jobs and other social activity. As such, the aim is to assist in the wider integration of those who do not speak the national language in British society.

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<sup>1</sup>Language increases productivity and communication (and hence the market wage) and also increases employment probabilities. (Dustmann, C, van Soest, A, 2003. The Language and earnings of immigrants, Industrial and labour relations review, Vol 55, No 3).

<sup>2</sup> Wikipedia Speak Mandarin Campaign [http://en.wikipedia.org/wiki/Speak\\_Mandarin\\_Campaign](http://en.wikipedia.org/wiki/Speak_Mandarin_Campaign)

<sup>3</sup> “Immigrant children benefit from Finnish education”, Jessica Shepherd, The Guardian, 21 November 2011. <http://www.guardian.co.uk/education/2011/nov/21/finland-education-immigrant-children>

## **7. Description of options considered (including do nothing)**

38. We considered three options which are described in this IA:

Option 1 - Remove voiceovers and interpreters

Option 2 - Remove voiceovers on the theory test but retain the use of interpreters on all tests

Option 3 – Remove interpreters on both theory and practical driving tests but retain the use of voiceovers on theory test

39. It was considered that the do nothing option, which would allow the status quo to continue, would not achieve the desired effects and an opportunity to improve road safety and social cohesion would have been missed.

## **8. Costs and benefits of each policy option**

40. Given the limitations of the available evidence base, it has not been possible to monetise some of the costs and benefits that have been identified. Where it has not been possible to monetise a cost or benefit, a full qualitative description of the cost or benefit has been provided.

41. Furthermore, given the limitations of the available evidence base, it has been necessary to make a range of assumptions in order to estimate the monetised costs and benefits. The estimates presented in this impact assessment are therefore sensitive to the assumptions that have been made in the IA. These estimates should therefore be interpreted as indicative of the potential order of magnitude of these costs and benefits.

### **9.1. Option 1 – remove voiceovers and interpreters**

#### **9.1.1. Costs of Option 1**

##### Monetised costs to drivers – Option 1

42. Under Option 1, all those wishing to take a test will need to understand English or, if the test is taken in Wales and they choose to do so, in Welsh. The knowledge of the national language will need to be such to enable candidates to understand instructions in the on-screen theory test or the on-road practical test.

43. The theory test must be passed before a practical test is taken. The total number of theory tests therefore includes the figures of those who will go on to take the practical test. In 2011/12, 57,361 candidates requested a theory test with voiceover in non English or Welsh languages and 1,690 requested a test with an interpreter. We have used these figures as the basis for the number of people affected.

44. We cannot, however, be certain that all those currently making use of voiceovers or interpreters will be unable to understand the national language adequately to take the test. It is possible that some may have a sufficient understanding of English or Welsh to assist them through the process. For example, it is possible that, as there are other significant benefits in terms of living and working in Britain from learning the national language, many taking the test may already have undertaken some training or learnt elements of the language from friends or relatives or within the wider community. In addition, some, who are more adept in the national language, may find an English or Welsh voiceover of assistance – and there are no plans to remove this facility.

45. In addition, there are a number of options for candidates to learn English or Welsh in order to take the test – training taken online, traditional training in a classroom, training taken within community groups, places of worship, schools, and learning from family and friends. We have also become aware of instances where driving instructors teach basic English as they deliver driving instruction.

46. We do not have access to any evidence on the percentage of candidates currently making use of voiceovers or interpreters that would need to learn English or Welsh in order to be able to take the test

under Option 1, and the percentage of these candidates that would learn English or Welsh by undertaking a training course as opposed to using family, friends and local community centres.

47. Given the limitations of the available evidence base, it is necessary to make illustrative assumptions regarding both of these percentages in order to estimate the costs to candidates of learning English or Welsh under Option 1.

48. For the purposes of this IA, we have used a range of illustrative assumptions in recognition of the uncertainty surrounding these percentages. Firstly, we have assumed that 75% of candidates currently making use of voiceovers or interpreters would need to learn English or Welsh when calculating the “best” estimate; 50% for the “low” estimate; and 100% for the “high” estimate. Secondly, we have assumed that 50% of the candidates that need to learn English or Welsh would take formal training when calculating the “best” estimate, with the remainder learning informally, via family or friends, or via the internet; 25% for the “low” estimate; and 75% for the “high” estimate.

49. The most commonly taught course for those wishing to learn or improve their English language skills is ESOL (English for speakers of other languages). These courses are widely available through colleges and other learning providers in towns and cities, and can be studied part-time or full-time – details on how to access these courses can be found on the national careers service website at the following link:

<https://nationalcareersservice.direct.gov.uk/Pages/Home.aspx>.

50. An internet search of training providers of ESOL local to DSA headquarters in Nottingham found a number of colleges offering ESOL courses on a part-time or evening basis at a cost of between £371 to £504. Further searches of the internet found basic language courses ranging from £120 to £200 in the London area, although these were not ESOL courses.

51. Many local areas are delivering ESOL courses in innovative ways such as tailoring lessons to reflect particular local circumstances; broadening the curriculum to include for example, components on citizenship or road traffic law; or providing lessons in accessible shared spaces such as museums and libraries.

52. There are a variety of training courses available online. For example, the British Council run a free website, as do the BBC. Access to the internet may, however, be an issue for those new to Great Britain, which means that many may need to obtain more traditional training.

53. There are also intensive courses available – of around 30 hours per week - that would teach English in around four weeks. These are often linked to Universities and may therefore be unavailable to those new to Great Britain, unless they are students.

54. For those wishing to learn Welsh, there are a variety of courses available at colleges in different parts of Wales. An internet search identified three courses in Bangor, Cardiff and Barry with lengths between 3 days and 30 weeks. Costs ranged from £149 to £175, with an average cost of around £160.

55. We have, therefore, taken the range of estimates that we have found as the basis for our calculations when estimating the financial cost of undertaking formal training to learn English or Welsh. The cost of a local, basic ESOL course of £371 is the most typical and has been used when calculating the “best” estimate, and we have, used a range of £120 and £500 when calculating the “low” and “high” estimates. Some candidates may learn the language informally, from friends and relatives, and there will be no training cost from learning this way.

56. There is also a time cost associated with learning English or Welsh. In response to consultation, it was suggested that we may have under-estimated the length of time a student may need to study to obtain an appropriate level of linguistic expertise. In the light of this, we have undertaken further research in liaison with the educational sector and have researched additional online details of ESOL courses available and their length. In doing so, we have been conscious of the fact that the time spent by an individual will vary enormously depending on the standard of linguistic knowledge already attained and the courses that are available. We are aware that the length of courses can vary, some requiring attendance for four hours a week, for around 30 weeks, others requiring students to attend for a shorter period of time. The assessment also takes into account the wide range of abilities of candidates, from beginners to those who have a working knowledge of the language but want to

increase their skills. The standard of expertise is outlined in the <sup>4</sup>Common European Framework. Along with the Languages Ladder, this includes the ranges from A1 (entry levels 1, 2 and 3) to C2 (masters and doctorate). It is assessed that the most appropriate level is A1. As such, for the purpose of this IA, we consider that the assumptions made in the draft IA are broadly appropriate, if taken to apply to all candidates and accepting that there is a range of lower and higher time periods that can apply. We have assumed that learning the language will take on average 34 weeks and 2 hours per week on a part-time basis<sup>5</sup> when calculating the “best” estimate. This gives 68 hours per candidate. In addition, we have assumed an illustrative range of 30 hours and 100 hours when calculating the “low” and “high” estimates, to cover different situations.

57. No estimate is available for the value that candidate might be placing on the time taken in language training. As a proxy for this we use the value placed on time spent travelling as the Department for Transport publishes a value for this. According to this, people value a one hour reduction in travel time (when neither commuting nor travelling for work) at £5.77 in 2013 prices.<sup>6</sup>

58. The cost in time is calculated based on 100% of those candidates who will need to learn English or Welsh. Whilst not all will pay for training, all will be required to expend time in learning.

59. The “best” estimate is that the overall cost for drivers to learn English in 2013 is of the order of magnitude of £26 million as calculated below. These are based on 2010 prices, which have been revised to take account of estimated annual growth rate. A table at 8.1.3: shows how this has been calculated for every year in the ten year period 2013 - 22, covered by this IA.

### Best estimate (2013)

A	Cost of learning English - average fee	£371
B	No taking theory tests with voiceover	57,361
C	No taking theory tests with interpreter	1,690
D (B+C)	Total taking theory test with language support	59,051
E	% theory test candidates to learn English or Welsh	75%
F (DxE)	Theory test candidates to learn English or Welsh	44,288
G	% taking formal training	50%
H (FxG)	taking formal training	22,144
I (AxH)	Cost of formal training @ £371pp multiplied by number of theory test candidates learning English/Welsh	£8,215,470
J	Hourly cost for leisure time in 2013 <sup>7</sup>	£5.77
K	No of assumed hours to learn English/Welsh	68
L (FxJxK)	Overall time cost for candidate (adjusted due to rounding)	£17,375,112
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£25,590,582
N	Per capita cost for each candidate	£577.82

60. The two variations of this estimate are “low” and “high” and are set out in detail below.

61. The “low” estimate gives an overall cost of almost £6 million.

<sup>4</sup> Can be found at National Centre For Languages website  
[http://cilt.org.uk/home/standards\\_and\\_qualifications/common\\_european\\_framework.aspx](http://cilt.org.uk/home/standards_and_qualifications/common_european_framework.aspx)

<sup>5</sup> This is based on a course at a local college in Nottingham area.

<sup>6</sup> In Table 2 – Values of Non Working Time Per Person - DfT WebTag publication “Tag Unit 3.5.6: The Economy Objective” gives £5.71 (for 2010, increasing annually after that) as the value for “other” activities. It is therefore assumed that this figure will apply to leisure time. The table can be found at this link [http://www.gov.uk/dft/webtag/documents/expert/pdf/u3\\_5\\_6-vot-op-cost-120723.pdf](http://www.gov.uk/dft/webtag/documents/expert/pdf/u3_5_6-vot-op-cost-120723.pdf).

<sup>7</sup> Full figure for leisure time is £5.7693936295153. Rounded to £5.77 for purposes of display.

### Low estimate (2013)

A	Cost of learning English - average fee	£120
B	No taking theory tests with voiceover	57,361
C	No taking theory tests with interpreter	1,690
D (B+C)	Total taking theory test with language support	59,051
E	% theory test candidates to learn English or Welsh	50%
F (DxE)	Theory test candidates to learn English or Welsh	29,526
G	% taking formal training	25%
H (FxG)	taking formal training	7,381
I (AxH)	Cost of formal training @ £120pp multiplied by number of theory test candidates learning English/Welsh	£885,765
J	Hourly cost for leisure time in 2013	£5.77
K	No of assumed hours to learn English/Welsh	30
L (FxJxK)	Overall time cost for candidate (adjusted due to rounding)	£5,110,327
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£5,996,092
N	Per capita cost for each candidate	£203.08

62. The “high” estimate gives an overall cost of some £56 million.

### High estimate (2013)

A	Cost of learning English - average fee	£500
B	No taking theory tests with voiceover	57,361
C	No taking theory tests with interpreter	1,690
D (B+C)	Total taking theory test with language support	59,051
E	% theory test candidates to learn English or Welsh	100%
F (DxE)	Theory test candidates to learn English or Welsh	59,051
G	% taking formal training	75%
H (FxG)	taking formal training	44,288
I (AxH)	Cost of formal training @ £500pp multiplied by number of theory test candidates learning English/Welsh	£22,144,125
J	Hourly cost for leisure time in 2013	£5.77
K	No of assumed hours to learn English/Welsh	100
L (FxJxK)	Overall time cost for candidate (adjusted due to rounding)	£34,068,846
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£56,212,971
N	Per capita cost for each candidate	£951.94

### Non-monetised costs to drivers – Option 1

63. Potentially, if drivers were unable to obtain a driving licence until they could understand and speak the national language, they may be prevented from gaining employment or find their employment prospects restricted. We do not know to what extent this may apply and so are unable to monetise this. We did find evidence, however, that a better understanding of national languages actually improves employment prospects (please see non-monetised benefits to drivers regarding Option 1 below), with subsequent interaction with colleagues being likely to further enhance linguistic skills, so in the longer term the benefits may have the potential to outweigh the costs.

## Non-monetised costs to business – Option 1

64. There is a potential cost to approved interpreters in reduced income if they are no longer used for theory tests. In 2011/12, there were 2,262 theory tests conducted where interpreters accompanied a candidate. We believe that interpreters for theory tests charge candidates in the region of £100 to accompany them on test. It is expected that many of these will undertake alternative translation activities<sup>8</sup>. Unfortunately, we have no way of knowing how many will do so and are unable to monetise this cost.

65. For the 19,555 practical tests where an interpreter is requested, the candidate can be accompanied by anyone they wish. This can often be a friend or relative, for whom there will be no charge, or a driving instructor who will have already have received payment.

66. Removing voiceovers will result in moderate loss of income to the theory test contractor<sup>9</sup>. Currently, DSA pays for delivering voiceovers, comprising an annual update of the question bank. There are 19 languages other than English or Welsh in which voiceover translation is provided. It is, however, possible that any loss to the theory test contractor may be offset by undertaking alternative activities. As it is impossible to quantify how much of this loss would be offset by other activities, we are unable to monetise this cost. Furthermore, we are unable to include the figures for the income from voiceovers as this would undermine the commercial confidentiality of the tender exercise for the new theory test contract, which is currently being undertaken.

67. It is possible that employers may find more difficulty recruiting staff for driving jobs, as those who do not speak English or Welsh may decide to work in other fields, rather than learn to speak the national language. The scale of this is, however, unknown and we have been unable to identify any further non-monetised costs for business.

## Monetised cost to the public sector – Option 1

68. There is a possibility that there may be a shortfall in income from driving tests. We anticipate that it may take around 34 weeks for an individual to learn English. If this resulted in a corresponding reduction in those coming forward for tests, and all those who currently use voiceovers or interpreters do not book tests, the effect could be a 1.9% reduction in annual turnover. This is calculated as follows, using the total number of tests conducted – 106,112 for theory test voiceovers, 2,262 for theory test interpreters and 35,000 for practical test interpreters – rather than the number of candidates taking these tests:

	Theory test voiceovers	Theory test interpreters	Practical test interpreters	Total
A. Numbers	106,112	2,262	35,000	143,374
B. Numbers per week (A/52)	2,041	44	673	2,757
C. Numbers for 34 weeks (B x 34)	69,381	1,479	22,885	93,745
D. Test fee	£31.00	£31.00	£62.00	
E. Loss of income for each test type (C x D)	£2,150,808	£45,849	£1,418,846	£3,615,504
F. Annual turnover				£190,000,000
G. Percentage of annual turnover				1.9%

69. We are, however, taking steps to overcome this issue. We consulted on the amount of notice of any change. In the light of this, six months is considered to be a reasonable period of time. Anyone who wishes to take the test, between announcement of a change and implementation, will be able to use a

<sup>8</sup> This is based on the assumption of full employment in the economy. The translators will shift to their-best job option which will be only marginally less lucrative than translating for driving test-takers

<sup>9</sup> Large multi-national company outside of the definition of micro or small business

voiceover or interpreter. Anyone taking the test after this will be fully aware of the requirements in advance of starting their instruction and so will be able to prepare in terms of learning the language. This should avoid any drop in income by candidates not being ready for test.

#### Non-monetised costs to the public sector – Option 1

70. There is a possibility that non English or Welsh speakers may decide not to take the test, with a fall in income for the public sector. This number is unknown and therefore, at this stage in the process, not quantifiable in terms of the effect on DSA finances. It is also possible that removal of voiceovers and interpreters may encourage the incidence of impersonations at tests, as a means of overcoming the need to take part in the testing process. Candidates who are not sufficiently versed in the national language may see the use of an impersonator as the easiest, cheapest option to gain a driving licence. But the numbers here are also unknown.

#### **9.1.2. Benefits of Option 1**

##### Monetised benefits to drivers – Option 1

71. The benefit to drivers of no longer needing to pay for interpreters has been estimated at £226,200. This is based on 2262 requesting the services of a translator at a cost of £100 per test.

##### Non-monetised benefits to drivers – Option1

72. One key benefit is the potential for better road safety for all drivers, as those on the road are more likely to understand English or Welsh, and thereby are more likely to be able to read non-pictorial road signs and directions (such as emergency directions). It is not possible to predict, with any degree of accuracy, the numbers of accidents that such a move will prevent. However, it is expected that this move should enable drivers to better interact with other road users, reducing the risk of accidents occurring and subsequent costs for loss of life or serious injuries. One potential downside is that some may decide to drive unlicensed rather than learn the national language. However, this impact is difficult to quantify and is thus, left non-monetised. For detailed costs of accidents please see: <http://www.dft.gov.uk/webtag/documents/expert/unit3.4.1.php>

73. Drivers will also benefit in that their knowledge of English can be used in wider ways in addition to driving – in social situations, the workplace and in becoming a part of the community. It has been shown that a better knowledge of English opens up opportunities for work and provides for increased wages and thereby better living standards<sup>10</sup> (also see footnote 1 above). The range of job opportunities available to those affected is not known, nor is the proportion of those using voiceovers and translators who are unemployed. It is therefore not possible to monetise this benefit. Other, wider, societal benefits involving increased interaction within the community are social in nature and are not quantifiable.

##### Non-monetised benefits to business – Option 1

74. We anticipate that businesses who wish to employ staff with national language skills will now be able to recruit from a larger pool of candidates. However, this increase will be limited since the number of non-national language speaking drivers is relatively small in comparison with the size of the wider labour force. It is also possible that other businesses, for whom language skills are less important but who employ staff primarily for driving related activities, may experience increased competition when recruiting employees.

75. The effect of this benefit is not quantifiable in monetary terms as we do not have figures of those employing non-English speakers.

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<sup>10</sup>Fluency in English (as assessed by an interviewer) increases the average hourly occupational wage by approximately 20 per cent (Shields MA and Wheatly-Price S. 2002. The English language fluency and occupational success of ethnic minority immigrant men living in English metropolitan areas, *Journal of Population Economics*, pp. 137-160).

### Monetised benefit to the public sector – Option 1

76. There is a benefit in reductions in the cost of investigations into alleged fraud involving interpreters. At present, suspected theory test fraud costs a significant amount of money. This is as a result of the need for there to be an investigation, preparation of documents, legal costs and associated items. The average cost, to the Agency based upon 13 recent investigations is around £94,500 per annum. This figure can, however, be higher or lower, depending on the number of cases, and takes no account of the cost of bringing a case to Court, cost of Police and prosecution time. A risk of reducing the provision of voiceovers and interpreters is an increase in impersonations on test, the cost of which could negate any financial benefit to the public sector from making the change.

### Non-monetised benefits to the public sector – Option 1

77. There would be a moderate saving to the public sector in no longer being required to pay the theory test contractor for voiceovers. At the present time, this figure is commercially confidential as the tender exercise for the new theory test contract is taking place.

78. As given above for drivers, benefits including improved road safety for all drivers, could result in a reduction in accident rates and fatalities. This would have an effect of lowering the cost of provision of emergency and medical services as identified in the following link <http://www.dft.gov.uk/webtag/documents/expert/unit3.4.1.php#012>

### 9.1.3. Summary of monetised costs and benefits of Option 1

#### Best estimate

Annual profile costs and benefits - (£m) constant prices											
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total 10 year cost and benefit
Annual Cost to Drivers	£25.41	£25.40	£25.42	£25.59	£25.87	£26.19	£26.52	£26.84	£27.08	£27.32	£261.64
<b>Total annual costs</b>	£25.41	£25.40	£25.42	£25.59	£25.87	£26.19	£26.52	£26.84	£27.08	£27.32	£261.64
Annual Benefits to Drivers	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£2.3
Annual Benefits to Public Sector	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.90
<b>Total annual benefits</b>	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£3.2
<b>Total Net Benefits</b>	-£25.09	-£25.08	-£25.10	-£25.27	£25.55	£25.87	£26.20	£26.52	-£26.76	-£27.00	- <b>£258.44</b>

#### One in one out

79. The provision of language support is not contained in any primary or secondary legislation and so a change arising from the review would be non-regulatory. As such, the proposals that are contained in this IA do not fall within the requirements of One In One Out (OIOO) which needs to be complied with when new regulation is introduced.

## 9.2. Option 2 – remove voiceovers but retain the use of interpreters on all theory and practical tests

### 9.2.1. Costs of Option 2

#### Monetised cost to drivers – Option 2

80. Under this arrangement, where interpreters were allowed on all tests, but voiceovers were removed, candidates would not need to learn English. Those candidates who would otherwise have used a voiceover for the theory test could use the services of an approved interpreter instead. The arrangements for an interpreter attending the practical test with candidates would remain the same (the interpreter could also be a family member, friend or driving instructor).

81. It is assumed, for the purpose of this IA, that, under this Option, most candidates who had used a voiceover would opt to use the services of an interpreter. This would be less costly or time consuming than learning the language, which would be the only option open to those who did not use an interpreter. In each case, the additional cost to candidates from this proposal would be the amount paid to interpreters on the theory test which we believe is some £100 for each test. For the best estimate, this is £7,958,400 per year. We are using 75% as the best estimate and, in addition, ranges of 50% and 100%. As we are basing our estimates on the assumption outlined, these percentages are to some degree illustrative.

#### **Best estimate (2013)**

Average fee of interpreter services	£100.00
Number of candidates requesting tests with voiceovers	106,112
% using interpreters	75%
Number using interpreters	79,584
Total cost of interpreter services per year	£7,958,400

#### **Low estimate (2013)**

Average fee of interpreter services	£100.00
Number of candidates requesting tests with voiceovers	106,112
% using interpreters	50%
Number using interpreters	53,056
Total cost of interpreter services per year	£5,305,600

#### **High estimate (2013)**

Average fee of interpreter services	£100.00
Number of candidates requesting tests with voiceovers	106,112
% using interpreters	100%
Number using interpreters	106,112
Total cost of interpreter services per year	£10,611,200

#### Non-monetised cost to drivers – Option 2

82. Those drivers who were unable to speak the national language would be required to either learn the language or use the alternative option of arranging for an interpreter to attend the test. Some drivers might not use the services of an approved interpreter. These drivers might instead, take a chance on taking the theory test in the belief that they may be able to pass it without understanding sufficient English. If the driver did not pass the theory test this would result in a wasted payment of the test fee (for car tests £31).

#### Non-monetised cost to business – Option 2

83. There would be a loss to the theory test provider from removal of the voiceovers as stated above at Option 1. This would consist of reduced income from updates of the questions in the 19 languages where voiceovers are provided. It is, however, possible that any loss to the theory test contractor may

be offset by undertaking alternative activities. As it is impossible to quantify how much of this loss would be offset by other activities, we are unable to monetise this cost. Furthermore, we are unable to include the figures for the income from voiceovers as this would undermine the commercial confidentiality of the tender exercise for the new theory test contract, which is currently being undertaken.

## 9.2.2. Benefits of Option 2

### Non-Monetised benefit to the public sector – Option 2

84. There would be a corresponding saving from not having to pay for voiceovers (see “cost to business”). Again this figure cannot be included.

## 9.2.3. Summary of monetised costs and benefits of Option 2

### Best estimate

Annual profile costs and benefits - (£m) constant prices											
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total 10 year cost and benefit
Annual Cost to Drivers	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£79.50
<b>Total annual costs</b>	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£79.50
Annual Benefits to Drivers	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Annual Benefits to Public Sector	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
<b>Total annual benefits</b>	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
<b>Total Net Benefits</b>	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	£7.95	<b>-£79.50</b>

### **One in one out**

85. The provision of language support is not contained in any primary or secondary legislation and so a change arising from the review would be non-regulatory. As such, the proposals that are contained in this IA do not fall within the requirements of One In One Out (OIOO) which needs to be complied with when new regulation is introduced.

## 9.3. Option 3 – remove interpreters but retain the use of voiceovers on theory test

### 9.3.1. Monetised costs of Option 3

#### Monetised cost to drivers – Option 3

86. There would be a need to understand the national language on the practical test and to an extent on the theory test for languages/dialects where voiceovers were not available. Under this option, there were no plans to increase the number of voiceovers to account for the removal of interpreters, and this is included as an assumption in this IA. It would be necessary for candidates who are affected by this to learn the national language.

87. Overall, we have estimated that the potential monetised cost to drivers of this option could be £0.8 million to £18, with a Best estimate of £6 million per annum on average. This figure is based on the fact that those using interpreters would not speak the language offered by a voiceover and would have no option but to learn the language or take the test without sufficient linguistic skills to have a realistic chance of passing. These candidates may wish to need to take professional training, which involves a cost. It is made up from the following information, which is explained fully under “Monetised cost to drivers” in Option 1: number of persons needing to learn the national language (which is based on the number receiving language support), the average ESOL course fee (£371), number of hours needed to study ESOL (average 68 hours), and the cost of leisure time used for study (£5.77 per hour, in 2013 prices). The difference between the Options 1 and 3 is that, in Option 1, the cost to drivers will be incurred before the theory test, whereas, in Option 3, this would be delayed until the practical test. As fewer drivers take the practical test, the numbers will be lower.

88. As with other Options, we include variations of the percentages concerned, which are illustrative.

### Best estimate (2013)

	Theory test	
A	Cost of learning English - average fee for an ESOL (English for speakers of other languages) course. Please see Option 1 – “Monetised costs to drivers” – for a fuller explanation.	£371
B	No of theory tests	1690
C	% affected	50%
D	Numbers affected	845
E	% theory test candidates to learn English or Welsh	75%
F	theory test candidates to learn English or Welsh	634
G	% taking formal training	50%
H	taking formal training	317
I (AxH)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£117,561
J	Hourly cost for leisure time in 2013	£5.77
K	No of assumed hours to learn English/Welsh	68
L (JxFxK)	Overall time cost for candidate (adjusted due to rounding)	£248,632
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£366,192
	Practical test	
N	Cost of learning English - average fee	£371
O	No of practical theory Tests	19555
P	% practical theory Test candidates to learn English or Welsh	75%
Q	100% of practical test candidates to learn English or Welsh	14666
R	% taking formal training	50%
S	Taking formal training	7333
T (NxS)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£2,720,589
U	Hourly cost for leisure time in 2013	£5.77
V	No of assumed hours to learn English/Welsh	68
W (UxSxV)	Overall time cost for candidate (adjusted due to rounding)	£2,876,922
X (T+W)	Total estimated cost to drivers of learning English/Welsh	£5,597,512
Y (M+X)	Total	£5,963,704

## Low estimate (2013)

	Theory test	
A	Cost of learning English - average fee for an ESOL (English for speakers of other languages) course. Please see Option 1 – “Monetised costs to drivers” – for a fuller explanation.	£120
B	No of theory tests	1690
C	% affected	0%
D	Numbers affected	0
E	% theory test candidates to learn English or Welsh	50%
F	75% of theory test candidates to learn English or Welsh	0
G	% taking formal training	25%
H	75% taking formal training	0
I (AxH)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£0
J	Hourly cost for leisure time in 2013	£5.77
K	No of assumed hours to learn English/Welsh	30
L (JxFxK)	Overall time cost for candidate (adjusted due to rounding)	£0
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£0
	Practical test	
N	Cost of learning English - average fee	£120
O	No of practical tests	19555
P	% practical test candidates to learn English or Welsh	50%
Q	100% of practical test candidates to learn English or Welsh	9778
R	% taking formal training	25%
S	50% taking formal training	2444
T (NxS)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£293,325
U	Hourly cost for leisure time in 2013	£5.77
V	No of assumed hours to learn English/Welsh	30
W (UxSxV)	Overall time cost for candidate (adjusted due to rounding)	£423,077
X (T+W)	Total estimated cost to drivers of learning English/Welsh	£716,402
Y (M+X)	Total	£716,402

## High estimate (2013)

	Theory test	
A	Cost of learning English - average fee	£500
B	No of theory tests	1690
C	% affected	100%
D	Numbers affected	1690
E	% theory test candidates to learn English or Welsh	100%
F	75% of theory test candidates to learn English or Welsh	1690
G	% taking formal training	75%
H	75% taking formal training	1268
I (AxG)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£633,750
J	Hourly cost for leisure time in 2013	£5.77
K	No of assumed hours to learn English/Welsh	100
L (JxFxK)	Overall time cost for candidate (adjusted due to rounding)	£975,027
M (I+L)	Total estimated cost to drivers of learning English/Welsh	£1,608,777
	Practical test	
N	Cost of learning English - average fee	£500
O	No of practical tests	19555
P	% practical test candidates to learn English or Welsh	100%
Q	100% of practical test candidates to learn English or Welsh	19555
R	% taking formal training	75%
S	50% taking formal training	14666
T (NxS)	Cost of formal training multiplied by number of theory test candidates learning English/Welsh	£7,333,125
U	Hourly cost for leisure time in 2013	£5.77
V	No of assumed hours to learn English/Welsh	100
W (UxSxV)	Overall time cost for candidate (adjusted due to rounding)	£8,461,537
X (T+W)	Total estimated cost to drivers of learning English/Welsh	£15,794,662
Y (M+X)	Total	£17,403,439

### Non-monetised Cost to drivers – Option 3

89. A driver cannot obtain a driving licence until they have successfully completed both the theory and practical tests, and must successfully complete the theory test first. Therefore, even if voiceovers remained for the theory test, the driver would have to learn the language before they could obtain a pass for the practical test. Potentially, if a driver was unable to obtain a driving licence until they could understand and speak the national language, they may be prevented from or at least delayed from gaining employment or find their employment prospects restricted. We do not know to what extent this may apply and so are unable to monetise this, however, we have found evidence that a better understanding of national languages actually improves employment prospects (please see non-monetised benefits to drivers regarding Option 3 above), so in the longer term the benefits may have the potential to outweigh the costs.

### Non-monetised cost to business – Option 3

90. Interpreters attending with candidates for the practical test are usually friends, relatives or their driving instructor. We do not believe that such an arrangement incurs costs to candidates or benefits to business and therefore no loss to business, as there will be no fee paid to a friend or relative and the amount paid to the driving instructor for translation will not be additional to what has already been

incurred for the use of the car for the driving test. Interpreters for the theory test must be approved by the DSA and must be recognised as qualified interpreters. We therefore believe that removal of interpreters from the driving test as a whole will only incur business costs for those who are approved for theory test interpretation services. The average charge for accompanying a candidate to test is around £100. It is expected that many of these will undertake alternative translation activities as a result of ceasing to allow interpreters on test. Unfortunately, we have no way of knowing how many will do so and are therefore unable to monetise this cost.

### Non-monetised cost to the public sector – Option 3

91. As with Option 1, there is potential that removal of interpreters may increase the number of impersonations at tests, as a means of overcoming the testing process. Candidates who are not sufficiently versed in the national language may see the use of an impersonator as the easiest, cheapest option. This could increase the number of fraud investigations carried out by the Agency. Unlike Option 1, the retention of voiceovers would mean that this would be likely to happen in those elements of the test where only an impersonator has been possible, the practical test or in cases where voiceovers are not available in the language/dialect spoken by the test-taker. There is also a possibility that some may decide not to take the test, which would result in a fall in income for the public sector. However, the numbers are unknown and therefore not quantifiable in terms of the effect on DSA's finances.

### **9.3.2. Monetised benefits for Option 3**

#### Monetised benefits to drivers – Option 3

92. The benefit to drivers of no longer needing to pay for interpreters has been estimated at £226,200. This is based on 2262 requesting the services of a translator at a cost of £100 per test.

#### Non-monetised benefits to drivers – Option 3

93. As for Option 1 above, the benefits of increased road safety and social integration cannot be monetised. They could include the potential for better road safety for all drivers, as those on the road are more likely to understand English or Welsh, and thereby are more likely to be able to read non-pictorial road signs and directions (such as emergency directions). Improved road safety would be a benefit to candidates at test, just as it will to other road users. One potential downside is that some may decide to drive unlicensed rather than learn the national language. However, this impact is difficult to quantify and is thus, left non-monetised.

94. Drivers will also benefit in that their knowledge of the national language can be used in wider societal ways in addition to driving – in social situations, the workplace and in becoming a part of the community. It has been shown that a better knowledge of the language opens up opportunities for work and provides for increased wages and thereby better living standards.

#### Non-monetised benefits to business – Option 3

95. We anticipate that businesses who wish to employ staff with national language skills will now be able to recruit from a larger pool of candidates. However, this increase will be limited since the number of non-national language speaking drivers is relatively small in comparison with the size of the wider labour force. It is also possible that other businesses, for whom language skills are less important but who employ staff primarily for driving related activities, may experience increased competition when recruiting employees.

96. The effect of this benefit is not quantifiable in monetary terms as we do not have figures of those employing non-English speakers.

### 9.3.3. Summary of monetised costs and benefits of Option 3

#### Best Estimate

Annual profile costs and benefits - (£m) constant prices											Total 10 year cost and benefit
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
Annual Cost to Drivers	£5.96	£6.01	£6.07	£6.13	£6.19	£6.23	£6.28	£6.32	£6.37	£6.42	£62
<b>Total annual costs</b>	£5.96	£6.01	£6.07	£6.13	£6.19	£6.23	£6.28	£6.32	£6.37	£6.42	£62
Annual Benefits to Drivers	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£0.23	£2.3
Annual Benefits to Public Sector	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.09	£0.90
<b>Total annual benefits</b>	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£0.32	£3.20
<b>Total Net Benefits</b>	£5.73	£5.78	£5.84	£5.9	£5.96	£6.0	£6.04	£6.09	£6.14	£6.19	<b>-£59</b>

#### One in one out

97. The provision of language support is not contained in any primary or secondary legislation and so a change arising from the review would be non-regulatory. As such, the proposals that are contained in this IA do not fall within the requirements of One In One Out (OIOO) which needs to be complied with when new regulation is introduced.

#### 9.4. Evaluation of options

98. On the basis of the monetised costs and benefits, the Net benefit (Present Value) of each option has been estimated as follows. However, these estimates do not take into account the non-monetised costs and benefits that have been identified in this IA. The full costs and benefits of each option are discussed below.

Option 1	Remove voiceovers and interpreters	- £221.70 million
Option 2	Remove voiceovers but keep interpreters	- £68.5 million
Option 3	Remove interpreters but keep voiceovers	- £51.2 million

99. Option 1 has the lowest estimated Net Benefit but is assumed to have the highest non-monetised benefits. It would remove all language support, which would have the effect of requiring candidates on both theory and practical tests to be able to understand the national languages. Therefore, Option 1 is estimated to result in the highest cost to non-English or Welsh speakers who are learning to drive, but it is assumed that it would ensure that the maximum numbers were encouraged to learn the national language, resulting in the highest non-monetised benefits in terms of the potential for better road safety and social cohesion.

100. Option 3 has the highest estimated Net Benefit but is assumed to have lower non-monetised benefits. This is because it would retain a significant level of language support - in the early stage of the

qualification process - and would enable candidates that are able to use voiceovers for the theory test to avoid learning the language until they were preparing for the practical test.

101. As it is assumed that only a minority of candidates would not be able to use voiceovers for the theory test and fewer people take the practical test compared to the theory test, it is assumed that fewer people would be encouraged to learn the national language. It is also possible that some will have a sufficient understanding of English or Welsh to take the practical test without assistance, but that this understanding is not sufficient to avoid the need to learn the language for the written test.

102. Therefore, the cost to candidates has been estimated to be lower than for Option 1, and it is assumed that the non-monetised benefits discussed above would also be lower than for Option 1. The greater the numbers who learn the national language, the greater the potential road safety benefit. Under Option 3, there will be fewer needing to learn the national language – as voiceovers will still be available – hence the reduced potential benefit in road safety. Similarly, there will be lower benefit for social inclusion. As stated in the analysis of this Option in section 8.3, we are unable to quantify or monetise this benefit.

103. Option 2 has a higher estimated Net Benefit than option 1. This is because candidates would be able to continue to avoid learning the national language, by using an interpreter on both theory and practical tests, at a lower estimated cost than learning the national language. However, the analysis for this option assumes that no candidates would be encouraged to learn the national language. Hence, the non-monetised benefits discussed above for Option 1 and Option 3 would not arise under this option.

## **10. Equality Impact Assessment**

104. DSA has undertaken an assessment of the equality issues for the last financial year under the following areas:

### Age

105. As a person must be seventeen to take the driving test, it is likely that those in their late teens and twenties will be most affected by any change in arrangements. This is a demographic point arising inevitably from the law surrounding access to tests and not something affected by an issue such as delivery in different languages.

106. The majority of voiceovers on the theory test in languages other than English or Welsh are taken between ages 21 and 25 (39,963 male, 15,238 female) and 26 and 30 (33,463 male and 17,829 female). This gradually falls for those aged between 31 and 35 (23,350 male and 14,069 female). There is also a temporary high at age 17 (17,723 male and 9,246 female).

107. The majority of practical car tests using an interpreter were taken at age 29 (874 male, 967 female), 28 (906 male, 876 female) and 31 (893 male, 866 female).

### Disability

108. There is no impact on disability. There will be no change in arrangements for special needs candidates taking the test.

### Gender

109. In terms of the numbers of tests, the group most affected by a change would be men, as more men take the test with use of a voiceover or interpreter (see below). However, comments made by the DSA RACE Group (see below under race) indicate that whilst a significantly lower proportion of tests involving an interpreter or voiceover were taken by women, the impact of removing the services may be higher. Not all women have the same access to educational provision as men and this may undermine their ability to learn the language. Within the UK every female is entitled in law, to equal access to education as that allowed a male counterpart – and unequal educational opportunity runs counter to the law. A knowledge of the national language may provide an individual with greater employment and educational opportunities in a similar way as for males.

- 913,288 theory tests were taken by men (62% pass rate) and 679,218 were taken by women (64% pass rate)
- 1,558 theory tests with an interpreter present were taken by men (51.09% pass rate) and 704 were taken by women (47.59% pass rate).
- 102,953 theory tests were taken with a voiceover in English by men (54.29% pass rate) and 49,223 were taken by women (46.87% pass rate).
- 15 theory tests were taken with a voiceover in Welsh by men (73.33% pass rate) and 11 were taken by women (81.82% pass rate).
- 69,998 were taken with a voiceover in other languages by men (32% pass rate) and 37,114 were taken by women (39.58% pass rate).
- 18,552 practical car tests were taken by men (35.3% pass rate).

### Gender Reassignment

110. We do not consider there are issues arising as a result of gender reassignment.

### Race

111. DSA has an established “race group” the collective purpose of which is to provide a formal and visible mechanism for enabling Black, Minority and Ethnic (BME) members of staff and those with an interest in RACE issues to come together to share information and support. This is a valuable workplace resource to help the Agency to:

- Promote DSA’s diversity agenda, highlighting the Agency as an employer of choice,
- Comply with equalities legislation and the civil service duty to promote equality of opportunity.

112. The RACE group commented regarding the removal of voiceovers and interpreters at driving tests:

- “There is clear evidence of BME unemployment disproportionately higher than non-BME within the same geographical areas. In addition the current pass rate for non-English theory tests is significantly lower already, to remove this option without proper substitution or alternatives would be detrimental to the protected BME group. This may also reduce the number of BME females wishing to obtain a driving licence as some have educational restrictions imposed on them. There are cultural differences in the way people interpret e.g. ‘pull up on the left before the car’ is commonly mistaken by BME candidates without a good understanding of English to mean ‘after the car’. This way of understanding could be exacerbated in a theory test without aids. I believe that other DfT agencies supply material and other services in foreign languages.
- Learning English for most will probably take some time, especially for the older generation. Even after someone grasps the basic level of English will still struggle to cope with different accents and complex words which some examiners choose to use which are not plain English. Now DSA has relaxed on the test wordings as long as the words are similar to the prescribed ones.
- The extra time it will take to learn the English language will delay acquiring a licence and therefore restrict job prospects. This in turn may affect unemployment rates and increased cost to the government in benefit payments.
- When the whole purpose of this change is to prevent illegal activity by interpreters, this change may increase the number of impersonators as candidates will see it as the easiest and quickest option”.

113. There may be an impact on the racial groups most represented in the figures of those for whom voiceovers or interpreters are provided. This could affect some who are seeking employment, particularly those who are newly arrived in the UK. However, research has shown (see footnotes 1 and 4 above) that learning the national language actually opens up and increases opportunities for employment and higher wages. This would be beneficial for those areas and communities where BME

or non-English speakers have higher than normal unemployment. It could also be argued that an improved understanding of the national language should also encourage a better understanding of the questions/actions on driving tests with the benefit of increased pass rates.

114. It is also not the case that the Department for Transport (DfT) and its Agencies routinely supply material and other services in foreign languages. The Department or its Agencies only produce material in languages other than English or Welsh as one-offs if they specifically wish to provide information to a particular group when running a campaign. For example, VOSA has in the past, produced leaflets in Polish and French, to aid with tachograph checks on foreign registered vehicles entering GB. This is because in the main, it is these languages that are most commonly spoken by the drivers of those vehicles.

115. It is normal for the DfT, when developing proposals, to consider their impact upon certain groups and that those groups are consulted; for example:

*When the third runway at Heathrow airport was considered, it was found that there were a number of foreign language communities in and around the airport. In order for those communities to contribute to the consultation the Department for Transport translated a summary of the proposals and how to respond into those foreign languages. Within the summary it also advised that non-English speakers ask their English speaking friends or relatives to translate information in the Consultation paper for them. This approach has also been used for the High Speed Rail consultation run by the Department*

116. The majority of theory tests taken with an interpreter were in Romanian (542), Mandarin (367), Somali (336) and Russian (300).

117. The majority of theory tests taken in other languages were in Urdu (24,701), Polish (17,387), Kurdish (7126), Turkish (9429) and Punjabi (9719).

118. We do not collect data on the specific language that a practical test candidate has the examiner's directions translated into. But, self-declared racial/ethnic groups of practical car tests were:

White – 6065  
Asian or Asian British - 1234  
Black or black British – 402  
Mixed – 244  
Chinese – 196  
Other – 522  
Prefer not to say – 324  
No preference given – 25,683

119. These figures can be compared with the following estimates of the different population groups thought to be resident in GB. We do not know of any official publication of all language speakers and residents so these estimates have been taken from various sources:

Romanian – 58,000 (ONS estimate)  
Russian – 32,000  
Somali – 108,000 (ONS estimate)  
Mandarin – 400,000+ of Chinese origin (ONS estimate)  
Urdu speakers – 400,000  
Polish – 515,000 (ONS estimate)  
Kurdish – 200,000 – 250,000  
Turkish – 500,000 (Federation of Turkish Associations UK)  
Punjabi speakers – 593,500

#### Religion or Belief

120. It is unlikely that any discrimination on the basis of a person's religious beliefs as a direct result of the withdrawal of language support for test candidates.

## Sexual Orientation

121. We do not consider there are issues with sexual orientation.

### **11. Special Impact Test – Small Firms**

122. In March 2011, the Government announced a moratorium on new regulations affecting micro businesses - those with less than 10 employees - and start ups from April 2011 until 2014. Translators, some of which can be micro-businesses, will lose their jobs if interpreters and voiceovers are removed. However, under the full-employment assumption, these will simply undertake another activity which pays equal to the opportunity cost of being a translator for driving tests.

### **12. Road Safety**

123. Understanding the national language will mean that drivers can read non-pictorial road signs and other information which may help road safety. One potential downside is that some may decide to drive unlicensed rather than learn the national language

124. Current figures on accidents involving foreign registered vehicles may be useful. From 2005 to 2010, there were 11,037 (1%) accidents involving foreign vehicles of a total number of 1,058,570 accidents. Of fatal and serious accidents, the figures are 1,519 (1%) of 154,536 and, of fatal accidents, 251 (1.7%) of 14,682. When taking cars alone, the figures are 4386 (0.5%) of 943,663 accidents, 554 (0.4%) of 126,758 fatal and serious accidents and 67 (0.6%) of 11,688 fatal accidents.

125. But this is only indicative. Drivers of these vehicles may be foreign nationals driving their vehicle on an EU licence. It tells us nothing about their language.

### **13. Approach across Government**

126. The review is one of the flagships of a wider trend across Government Departments to make services available primarily in the national language. The reason behind this is the same as the underlying rationale for this review. The intention is to strengthen social cohesion and a sense of a shared culture within society. It is felt that this can best be achieved by encouraging the use of a common language.

127. An example of another body with interest in this area is the National Health Service (NHS) which is reportedly considering reviewing its language support. The NHS provides translation for patient care at the cost of some £23m per annum. There have been calls in some quarters, most notably the group 2020 Health, for the costs to be reduced. However, it is important for the NHS, and any other body considering change, to take into account the reasons for the service before a decision is taken.

### **14. Administrative Introduction Of Change**

128. The review has concluded that the language support should be withdrawn and we need to give attention to action that could be taken to mitigate any negative affects of the change. This will include adequate notice, to avoid individuals part way down the learning process being inconvenienced.

## Annex A

### REVIEW OF LANGUAGE SUPPORT FOR DRIVING TESTS

#### OTHER MEMBER STATES

1. There are a variety of procedures for taking driving tests, in languages other than the national language/s in other member states. These do not support or undermine the review. They simply indicate that there is no clear standard for provision of language support across the EU.

2. The following tables summarise these:

#### Theory Test

Country	Tests can be taken in the following languages	Interpreter allowed
Austria	German, English, Croatian, Slovenian, Turkish	No
Belgium	French, Dutch, German	Yes
Bulgaria	Bulgarian, English	No
Croatia	Croatian and national minority languages	Yes
Cyprus	Greek, English	Yes
Czech Republic	Czech	Yes
Denmark	Danish	Yes
Estonia	Estonian, Russian, English	Yes
Finland	Finnish, Swedish, English	Yes
France	French	Yes
Germany	German, English, French, Italian, Greek, Polish, Portuguese, Romanian, Russian, Serbo-Croatian, Spanish, Turkish	No
Greece	Information unavailable	Information unavailable
Great Britain [Provision in Northern Ireland is identical]	English, Welsh, Albanian, Arabic, Bengali, Cantonese, Dari, Farsi, Gujarati, Hindi, Kashmiri, Kurdish, Mirpuri, Polish, Portuguese, Punjabi, Pushto, Spanish, Tamil, Turkish, Urdu	Yes
Hungary	Hungarian	Yes
Republic Of Ireland	Irish, English, Polish	Yes
Latvia	Latvian, Russian, English, French, German	Yes
Italy	Information unavailable	Information unavailable
Lithuania	Lithuanian, Russian	Yes
Luxembourg	French, German, Portuguese, English	Yes
Malta	Maltese, English	No
Netherlands	Dutch, English, Turkish	Yes
Poland	Polish, English, German	Yes
Portugal	Portuguese	Yes
Romania	Romanian, English, French, German, Hungarian	No
Slovenia	Slovenian, Italian, Hungarian	Yes
Spain	Motorcycle: Spanish Car: Spanish, French, English, German	No
Sweden	Motorcycle: Swedish Car: Swedish, Albanian, Arabic, Croatian, Serbian, English, Finnish, French, Persian, Russian, Sorani, Spanish, Turkish, German	Yes

## **Practical Test**

<b>Country</b>	<b>Tests can be taken in the following languages</b>	<b>Interpreter allowed</b>
Austria	German	Yes
Belgium	French, Dutch, German	Yes
Bulgaria	Bulgarian, English	No
Croatia	Croatian and national minority languages	Yes
Cyprus	Greek, English	Yes
Czech Republic	Czech	Yes
Denmark	Danish, English	Yes
Estonia	Estonian, Russian	Yes
Finland	Finnish, Swedish, English	Yes
France	French	Yes
Germany	German	No
Greece	Information unavailable	Information unavailable
Great Britain [Only English offered in Northern Ireland]	English, Welsh (in Wales)	Yes
Hungary	Hungarian	Yes
Republic Of Ireland	Irish, English	Yes
Italy	Information unavailable	Information unavailable
Latvia	Latvian, Russian, English	Yes
Lithuania	Lithuanian	Yes
Luxembourg	Information unavailable	Information unavailable
Malta	Maltese, English	No
Netherlands	Dutch, English	Yes
Poland	Polish	Yes
Portugal	Portuguese	No
Romania	Romanian	No
Slovenia	Slovenian, Italian, Hungarian	Yes
Spain	Spanish	No
Sweden	Not specific restriction but candidate must be able to understand the examiner's instructions	Yes