

CONSULTATION ON VEHICLE NUMBER PLATE SECURITY

Driver and Vehicle Licensing Agency

14 July 2003

A consultation paper

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1. INTRODUCTION AND CONSULTATION ARRANGEMENTS

1.1 Purpose

The Road Vehicles (Display of Registration Marks) Regulations 2001 set out the current legal requirements for the display of vehicle number plates conforming to the British Standard specification BS AU 145d. The Vehicles (Crime) Act 2001 includes provision for the addition of security features to number plates. This could include additional visible information displayed on the plates, changes to the specifications relating to the material of manufacture and also the possible use of microchip technology.

- (i) The purpose of this consultation document is to allow all interested parties to comment on the proposed security features outlined in this document. It also provides the opportunity to present alternative ideas. It is particularly directed at the enforcement authorities and the number plate industry. The proposals affect the whole of the UK.

1.2 Responses

- (i) Specific questions appear throughout the text and these are also listed in the response form at Annex A. It would ease analysis if responses were made on the response form, but separate written responses are also welcome. Representative groups should summarise who they represent.

The address to which to respond is:

SECURE NUMBER PLATE CONSULTATION
Vehicle Crime Group
DVLA
Longview Road
Swansea SA6 7JL

Alternatively, you can e-mail responses to Jayne.Roberts@dvla.gsi.gov.uk

Internet responses may be sent using the electronic version of the document available at:

http://www.dvla.gov.uk/public/consult/vrm_security/vrm_security.htm

- (ii) All responses to this document will be considered carefully, but they will not be acknowledged individually. Responses and the name of the respondents may be quoted and made available to the public.

Please indicate on the response form at Q 1 whether you are willing for this information to be made available.

1.3 OUTCOME OF CONSULTATION

- (i) At the end of the consultation period, the responses will be assessed and a report will be published on the Driver and Vehicle Licensing Agency (DVLA) and Driver and Vehicle Licensing Northern Ireland (DVLNI) web sites.

1.4 CONSULTATION CODE OF PRACTICE

- (i) This document complies with the 'code of practice on written consultation' issued by the Cabinet Office. If you consider that this document does not comply with the consultation criteria reproduced in Annex C, please write setting out the areas where you feel the document departs from the criteria. The address to write to is:

Mrs Anne McAleer
Consultation Co-ordinator
DVLA
Longview Road
Swansea
SA6 7JL

1.5 CLOSING DATE FOR RESPONSES

Responses must reach the Driver and Vehicle Licensing Agency (DVLA) by 17 October 2003.

2. BACKGROUND

This section explains the reasons behind the proposal and sets out the objectives of introducing security features on number plates.

2.1 GOVERNMENT STRATEGY TO REDUCE VEHICLE CRIME

- (i) In September 1998 the Vehicle Crime Reduction Action Team (VCRAT) was established by the Home Office to develop and implement a strategy to meet the Government objective of reducing vehicle crime. VCRAT recommended the introduction of a statutory registration scheme to control the supply of number plates, as well as the introduction of additional security features on number plates. The first part of this strategy was implemented in January 2003 with the establishment of a register of number plate suppliers in England and Wales.

2.2 REGISTRATION OF NUMBER PLATE SUPPLIERS

- (i) The object of the register of number plate suppliers is to regulate the industry in order to reduce the opportunities for vehicle crime. This is achieved by ensuring number plates are only sold to a purchaser who can show entitlement to a particular registration mark and can provide verification of personal details. Number plate suppliers are required to maintain a record of each transaction for a period of three years. This is an important source of information for the investigation of vehicle related crime. There will be a full review of these arrangements towards the end of 2004. The registration scheme introduces a series of checks and controls when a number plate is sold, but it does not deal with the theft of number plates nor with the self-assembly of plates. This paper puts forward proposals aimed at completing the process of creating a secure number plate system.

2.3 PROPOSAL TO REGULATE THE SUPPLY OF VIN (VEHICLE IDENTIFICATION NUMBER) PLATES

- (i) The police have pointed out that while the supply of number plates is now regulated, in England and Wales, there is no parallel system to regulate the supply of replacement VIN plates. This is now being considered as an additional measure against vehicle ringing (using the identity of a scrapped vehicle to disguise the identity of a stolen one).

Q 2 Do you agree that the supply of VIN plates should be regulated?

2.4 THE NEED FOR SECURE NUMBER PLATES

- (i) Indications are that the incidence of number plate theft is increasing. It is alleged that plates are being stolen from parked vehicles and used to clone others, particularly in London to avoid congestion charging and parking fines. Apart from the vehicle registration mark, there are currently no features on plates to link them clearly and visibly to the vehicles on which they are displayed. To rectify this and combat the increase in number plate theft consideration is being given to the inclusion of security features into number plate design.
- (ii) It should be noted that it is already an offence to sell ‘counterfeit plates’, for display on a vehicle or trailer. These are plates that do not conform to regulations relating to characteristics of number plates. The proposal is to amend regulations to take account of new security features, so that it would then become an offence to sell plates that failed to comply with the new requirements.
- (iii) The main benefits of introducing additional security features would be:
- To combat the cloning of vehicles thereby significantly reducing their potential use for criminal purposes.
 - To assist enforcement by making vehicles more easily identifiable.
 - To ensure greater accuracy of DVLA and DVLNI vehicle records.

Q 3 Do you agree that number plates should be made more secure?

3 SHORT TERM OPTIONS

- (i) Following consultation with the Association of Chief Police Officers (ACPO) and number plate manufacturers, a number of options for additional security features which may be incorporated on number plates have been identified.
- (ii) The following options are considered to be achievable in the short term as they involve using widely available manufacturing techniques and could be introduced at relatively low cost to the industry and the public. All these options could be introduced together as complementary measures or only some could be introduced and others discarded. Therefore each option should be considered on its own merit as a potential stand-alone measure.

3.1 SUPPLIERS IDENTITY NUMBER

- (i) Existing regulations already require the name and postcode of the supplying outlet to be displayed on plates. In addition, all suppliers of number plates in England and Wales are now required to register with DVLA and are allocated a unique supplier identity number.
- (ii) Details of the register are available to the police and published on the Internet, so it would seem sensible that the supplier identity number should also be displayed on the plates. This would aid enforcement by helping the police to trace the plate to the supplying outlet where records are held. It would also reinforce the importance of the register held by DVLA and indicate that the number plates had been supplied by a registered number plate supplier.
- (iii) It is recognised that it would not be possible to include the supplier identity number on plates supplied by businesses that are exempt from the requirement to register.
- (iv) The current British Standard does not define the term “supplying outlet”, and it is often unclear which business is required to display its name and postcode. For example, a manufacturer, a motor factor and a motor dealer might all lay claim to be the supplying outlet for the same set of plates. It is proposed to establish a link between the records of sales held under the registration scheme and the supplier’s details together with the supplier identity number on the number plates. This would require a change to regulations and consideration would also need to be given to changing the British Standard to ensure that “supplying outlet” is defined as the place at which records of sales are kept.
- (v) A decision must be made about the location of such a feature on the number plate. Care must be taken to avoid clutter, which would make the vehicle registration mark more difficult to read. It is suggested that the supplier identity number should certainly take up no more space than 13mm in height (the maximum permitted for the supplier’s name and postcode, and 57mm in length (the maximum permitted for the British Standard number and component supplier identifier). A final decision on this would be made at a later stage prior to making regulations.

Q 4 Do you agree that the supplier identity number should be displayed on number plates?

Q 5 Do you agree that the name and location of the supplying outlet displayed on number plates should be linked to the location where records of sales are kept?

Q 6 What are the likely costs of implementation to your business?

Q 7 How soon could your business implement this measure?

3.2 VISIBLE VEHICLE IDENTIFICATION NUMBER (VIN)

- (i) An increasing number of vehicles now display a visible VIN either in the windscreen or etched into the windows/lights. The inclusion of this identity marking on number plates would provide the police with confirmation that the plate was displayed on the correct vehicle. It would be a relatively simple matter to incorporate VIN details using existing production techniques, but it is acknowledged that the inclusion of the full 17 character VIN could lead to errors during that process which in turn could make policing more difficult. This could be overcome by using a partial VIN e.g. the last six digits.

- (ii) Suppliers would need access to the VIN in order to include it on replacement number plates. Number plate suppliers are required to carry out certain checks to establish that the customer is entitled to purchase the plates requested and one of the ways of doing this is to see the vehicle registration document (V5), which has the VIN printed on it. Where customers provide an alternative document, which does not have the VIN, they would have to provide the VIN in addition to the vehicle registration mark.

- (iii) As with the supplier identity number, it is suggested that the space taken up should measure no more than 13mm in height and 57mm in length. Please see the diagram at Annex D showing suggested locations for the supplier identity number and partial VIN. A final decision on this would be made at a later stage prior to making regulations.

Q 8 Do you agree that a VIN should be displayed on number plates?

Q 9 Do you agree that it should be a partial VIN?

3.3 DISPLAY OF MAKE/MODEL

- (i) The police have suggested that the make and model of the vehicle might also be shown on the plate along with the VIN. This would give an immediate and easily recognisable cross – reference between the plate and the vehicle.

Q 10 Do you agree that the make and model of the vehicle should be displayed?

Q 11 What are the likely costs to your business of displaying make/model or VIN?

Q 12 How soon could your business implement this measure?

3.4 WATERMARK

- (i) The use of a watermark on the reflective material intended for the manufacture of number plates would distinguish it from similar material used for other purposes, such as road traffic signing. This technique could also be used to distinguish vehicle number plates intended for use on the roads from number plates intended for show or demonstration purposes only. It is a condition of the registration scheme that equipment and materials are provided only to suppliers who are properly registered. This requirement would be much easier to control if the reflective material was watermarked. It is recognised that the material would need to be stored securely.
- (ii) One manufacturer that already incorporates watermarking in reflective sheeting has indicated that there would be no additional charge for this process. The standard process for watermarking is water gravure roll printing. The use of an angled watermark would be less susceptible to simulation, but the use of laser processing so that the watermark can be seen only from certain angles is not generally available in the sheeting supply industry at this time.
- (iii) A reasonable lead - time would be required to allow manufacturers to deplete existing stocks and consultees are asked to comment on this.

Q 13 Do you agree that reflective material used for the manufacture of number plates should be security marked?

Q 14 Is a hologram a viable alternative to a watermark?

Q 15 What are the likely costs to your business?

Q 16 How soon could your business implement this measure?

3.5 NOTING OF STOLEN PLATES ON POLICE NATIONAL COMPUTER (PNC)

- (i) The police have suggested that a marker should be added to the PNC to denote that a vehicle has had its number plates stolen. This would aid detection of cloned vehicles.

Q 17 Do you agree that marking vehicles on the PNC to show that number plates had been stolen would be beneficial?

3.6 DISTINCTIVE NUMBER PLATES FOR TAXIS AND PRIVATE HIRE CARS (MINI CABS)

- (i) Taxis and private hire cars and their drivers are licensed by local authorities in GB and by DVLNI in Northern Ireland – and a series of checks are undertaken to ensure the suitability of both the vehicle and drivers to provide this service. There have unfortunately been instances of people posing as taxi and private hire drivers to lure unsuspecting members of the public into their vehicle. Serious crime sometimes results from such deception.
- (ii) At present, all front plates have a white background and rear plates a yellow background. In order to make licensed taxis and private hire cars easily distinguishable to the public, it is proposed that number plates issued to these vehicles should be a different colour, e.g. blue or red.

Q 18 Do you believe that issuing plates with a different coloured background to taxis and private hire cars would bring benefits to public safety?

Q 19 If so, would there also be any merit in differentiating the colours of the plates for taxis and private hire cars?

3.7 USE OF HYPHENS ON NUMBER PLATES

- (i) The Road Vehicles (Display of Registration Marks) Regulations 2001 specify the typeface, the size, colouring and the British Standard that number plates must conform to. It is an offence to alter, rearrange or misrepresent letters or numbers in order to form names or words in such a way that makes it difficult to read the registration number. It is also an offence for number plate suppliers to sell plates for use on a vehicle that show registration numbers that have been misrepresented in this way.
- (ii) In order to further discourage this practice, it is suggested that a hyphen or hyphens could be placed in the registration number. An example is shown below, but alternative suggestions are welcome.

DG03–PJY

This would make it more difficult to arrange the number to form a word.

Q 20 Do you agree with the suggestion to make it mandatory to include a hyphen in the registration number?

3.8 INCLUSION OF MONTH AND YEAR OF ISSUE

- (i) The purpose of this proposal is to help the police identify stolen plates on cloned vehicles. If the month and date of issue were shown on the plates, it would be possible for the victims of stolen plates to pass this information to the police. Any plates showing the same vehicle registration mark but with a more recent date would be easily distinguishable.
- (ii) A further advantage would be that it would make it easier for the police to obtain information from the records kept by number plate suppliers. Rather than wading through all the records, they could go straight to the appropriate month and year.

Q 21 Do you agree with the suggestion to make it mandatory to include the month and year of issue on number plates?

4 LONGER TERM OPTIONS

The following options are considered to be achievable in the longer term, but will require more consideration by all parties concerned as well as further development of infrastructure. Initial discussions with both the police and number plate manufacturers have produced the following possibilities:

BAR CODING

- (i) Bar coding would provide a covert method of displaying vehicle details, such as the VIN, for matching against those on the vehicle. This would be a distinct advantage in terms of security over the proposal to overtly display VIN details. The main disadvantage would be the need for enforcement agencies to have access to bar code readers.

Q 22 Do you consider bar-coding to be a viable option?

4.2 TAMPER PROOF NUMBER PLATES

- (i) The police have suggested tamper proof fixings as a means of ensuring number plate security. They are already evident on a number of plates as one of the preferred methods of fixing is by using an adhesive compound, which hides any mechanical fixings. An extension of this security feature could be achieved whereby the number plate itself could be made tamper proof and as a

consequence rendered unusable for display on another vehicle. Ideas on how this could best be achieved are welcome.

Q 23 Do you consider making plates that cannot be re-used on another vehicle a viable option?

4.3 ELECTRONIC TAGGING OF NUMBER PLATES

- (i) Electronic tagging has the potential to provide the most reliable method of preventing the misrepresentation of a vehicle's identity through the display on its number plate of the registration mark of another vehicle ie "ringing" or "cloning."
- (ii) Electronic tagging would involve a tamper-proof microchip being incorporated within one or both number plates. The microchip would contain details of the vehicle's identification number (VIN). As indicated in para 3.2.(i), it is becoming increasingly common for this number to be displayed inside the windscreen or etched on windows and lights. Enforcement authorities would be able to satisfy themselves that the vehicle was what it purported to be by retrieving the data from the plate using a scanner and comparing it with the VIN displayed on the vehicle.
- (iii) Electronic tagging raises different considerations from any of the other possibilities outlined in this document, because the tag can be read remotely without the knowledge of those in the vehicle. It could therefore be seen as raising issues of confidentiality. It might be argued that those issues are not different from the use of Automatic Number Plate Recognition (ANPR): but electronic tagging could use less visible methods.
- (iv) The plate with an electronic chip could only be displayed on the vehicle for which it was originally intended. The practical implications of this would need to be considered. For example, over 281,000 transfers of cherished marks take place each year, and the motorists concerned would need to buy a new tagged plate every time they made a transfer. It should be noted that this must also be taken into account when considering the inclusion of vehicle related information on plates, such as the VIN and make/model.
- (v) At present 80% of plates are supplied from manufacturers in component form, with finished plates being assembled further down the supply chain. But the electronic tag would need to be enclosed in the plate at the manufacturing stage. So again, the practical implications would need to be considered. Also in order to ensure maximum security and integrity of the system, consideration would need to be given to the process by which the chip would be programmed.

Comments on the electronic tagging of number plates would be welcome.

Q 24 What is your view on the possibility of incorporating microchips in plates?

Q 25 Do you see any issues of confidentiality in the possibility? If so, what is your view of them?

Q 26 Do you have any views on any of the practical implications of electronic tagging?

Q 27 Should the microchips be in both front and rear plates?

4.4 POSSIBLE EXEMPTIONS

(i) It is not proposed that additional features should be shown on the face of plates fitted to historic vehicles, constructed before 1 January 1973.

Comments are invited about any other instances where it should not be mandatory for number plates to contain additional security features.

Q 28 Apart from plates for historic vehicles, do you believe there are any other cases for exemption from mandatory security features in number plates as outlined in this document?

Q 29 Do you wish to make any further comment?