

Review of the Registration of Number Plate Suppliers - 10 December 2004

Purpose and Scope

Contents Page

Review of the Registration of Number Plate Suppliers - 10 December 2004 Purpose and Scope.....	1
Contents Page.....	1
Introduction.....	1
Responses.....	2
Closing Date for Responses.....	2
Consultation code of practice.....	2
Disclosure of Information.....	2
2. Review of the Registration of Number Plate Suppliers.....	2
Background.....	2
Methodology.....	3
3. Findings and Recommendations.....	3
Scope of the Legislation.....	3
Extension to Scotland and Northern Ireland.....	3
The Supply of Plates at First Registration.....	3
Motor Dealers.....	4
The Sale of Rear Yellow Plates.....	4
Historic Vehicles.....	4
Show Plates.....	4
Distance Sellers.....	5
Fleet Operators.....	5
Supplier Obligations.....	5
Recommendation.....	6
Documentary Evidence.....	6
Enforcement.....	6
Customer Service.....	6
Fee.....	6
Supplier Identity Number.....	6
4. Next Steps.....	7
Regulatory Impact Assessment.....	7
5. Summary of Recommendations.....	7
Annex A : Consultation Criteria.....	8
Annex B: Results of Questionnaire.....	8
Section 1.....	8
Section 2.....	9
Section 3.....	9
Section 4.....	9
Effectiveness of the scheme.....	10
Annex C: List of Documentation.....	10
Annex D : List of Consultees.....	11

Introduction

1.1 The purpose of this document is to report the findings of a review of the registration of number plate suppliers and to set out the recommendations for public consideration and comment. It has been circulated to a representative sample of interested parties in England and Wales.

Responses

1.2 The proposals affect the Police, Local Authorities, businesses that supply number plates or materials used in their construction, businesses that purchase number plates, and the general public. To reply you should write to:

Number Plate Review Consultation
Crime Reduction Group
DVLA
3 Sandringham Park
Swansea Vale
Llansamlet
Swansea
SA6 7JL
Fax (01792) 765206

1.3 Alternatively, you can e-mail responses to Carole.Philpin@dvla.gsi.gov.uk. An Internet version of this document may be viewed at www.dvla.gov.uk/consultations.

Respondents from representative groups should summarise who they represent.

All responses to this document will be considered carefully, but they will not be acknowledged individually.

Closing Date for Responses

Responses must reach the Driver and Vehicle Licensing Agency (DVLA) by **4 February 2005**.

Consultation code of practice

1.4 This document complies with the 'code of practice on written consultation' issued by the Cabinet Office. A full twelve week consultation was conducted prior to making the current legislation. This document only proposes minor adjustments to procedures that have been widely discussed in the industry. Therefore the consultation period will last for eight weeks to enable work to begin on changes to legislation early in the new year. If you consider that this document does not comply with the consultation criteria reproduced at Annex A in any other way, 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
SV2
DVLA
Longview Road
Swansea
SA6 7JL

Disclosure of Information

1.5 Those who wish to submit comments to the DVLA in relation to this issue are asked to note that we may decide to publish all or some of the comments we receive. Please also note that if DVLA receives a request from any third party for sight of such comments, we may be obliged by law (for example, under the Freedom of Information Act 2000 once it is fully in force) to disclose such information to the applicant. If there are particular reasons why you would not wish your comments to be published or disclosed, please will you let us know. Although your wishes in this respect may not override any statutory requirement to disclose, they will be taken into account so far as possible. If you reply by e-mail, the above overrides any confidentiality disclaimer generated by your IT system.

2. Review of the Registration of Number Plate Suppliers

Background

2.1 The Register of Number Plate Suppliers (RNPS) was established in January 2003 to regulate the supply of number plates in order to reduce the opportunities to obtain false plates to disguise the identity of stolen vehicles or

vehicles used in criminal activity. All number plate suppliers in England and Wales must register with DVLA and conduct certain checks before selling plates.

2.2 Over 30,000 suppliers in England and Wales have registered since the scheme's inception. It has introduced some control over the supply of number plates for the first time and represents an essential component of the Government's strategy to reduce vehicle crime. The Association of Chief Police Officers continues to support the scheme and advocates its extension throughout the U.K. It has contributed to the 29.5% reduction in vehicle crime since 1999 as reported in the British Crime survey in July 2004.

2.3 The Government gave an undertaking to review the RNPS scheme within two years of the date of commencement to determine whether changes are needed. This document contains recommendations resulting from that process.

Methodology

2.4 As part of the review process DVLA issued a questionnaire to seek views on the main aspects of the scheme from a randomly selected sample of number plate suppliers taken from the register. The results of the questionnaire are located at Annex B.

2.5 The responses together with correspondence received from the public and the industry since the commencement of the scheme, and meetings with key stakeholders have enabled DVLA to identify a list of policy changes, some of which require amendments to the legislation.

3. Findings and Recommendations

Scope of the Legislation

3.1 This section deals with the territorial extent of the legislation and the type of business to which it applies.

3.2 A number plate supplier is someone whose business consists wholly or partly of selling number plates, i.e. finished plates that include the registration mark. Manufacturers, distributors, assemblers, motor factors, motor dealers and retail outlets including online retailers could fall within the scope of the scheme provided that they sell the finished product. Motor dealers who refit their stock with new number plates would be classed as number plate suppliers and would need to meet the requirements of the scheme. The scheme applies only to England and Wales.

Extension to Scotland and Northern Ireland

3.3 At present, the supply of number plates in Scotland and Northern Ireland is completely unregulated. It is very easy for anyone to obtain plates showing a registration mark for a vehicle with which they have no connection whatever.

3.4 The fact that the scheme does not operate throughout the United Kingdom undermines its operation in England and Wales. Therefore in order to provide secure, effective and consistent control over the supply of number plates on a UK – wide basis it is necessary that Scotland and Northern Ireland operate the same scheme.

3.5 Separate consultation exercises have been undertaken in Scotland and Northern Ireland in August 2002 and January 2004 respectively. In both instances the proposal to extend RNPS to Scotland and Northern Ireland was well received and generally supported.

Recommendation

To introduce legislation to extend the scheme to Scotland and Northern Ireland.

The Supply of Plates at First Registration

3.6 The only supply activity currently exempted under the legislation is the supply of plates for vehicles registered for the first time in the UK. This decision was based on the fact that we do not believe the allocation of registration numbers and the fitting of plates to newly registered vehicles is a problem area requiring further regulation. We note that the majority of respondents to the questionnaire were opposed to this exemption, but based on the information collated throughout the review process we wish to retain the current exemption for first registrations. It should be borne in mind that many motor dealers who fit plates to newly registered vehicles also deal in used vehicles and so would still have to register for that reason.

Recommendation

The supply of plates to vehicles registered for the first time in the United Kingdom is to remain exempt.

Motor Dealers

3.7 Many motor dealers re-fit their used vehicle stock with new number plates displaying the dealers details. By doing so they identify themselves as the supplying outlet, so it is right that they should be regarded as suppliers subject to registration. Registration also enables them to obtain plates or components from a manufacturer without providing documentary evidence as listed in the regulations. Therefore the business activity of motor dealers will remain within the scope of the regulations.

3.8 However, motor dealers have pointed out that no proof of identity is required to buy a vehicle, so it seems disproportionate to require proof of identity to buy the number plate fixed to it. We propose that dealers should continue to register and keep records of sales, but no longer be required to obtain documentary confirmation of name and address. They cannot, in any case obtain a registration document or other proof of connection with the vehicle prior to its sale. This change would not of course apply when a motor dealer sells number plates as separate items as opposed to fitting them to the vehicle.

Recommendation

Motor dealers who fit plates to vehicles for onward sale will be exempt from the need to obtain documentary evidence.

The Sale of Rear Yellow Plates

3.9 Trailer dealers have lobbied for exempting the sale of rear yellow plates and consideration has been given to this. It has been argued that vehicle thieves would need a complete set of plates, so there is no point in regulating the supply of rear plates as separate items. However, the rationale for the decision to include the sale of rear yellow plates in the scheme remains unchanged. To exempt the sale of rear yellow plates would create a loophole whereby criminals could use them on stolen caravans and trailers. Therefore, it has been decided that this business activity should remain within the scope of the regulations.

Recommendation

The supply of rear plates will remain within the scope of the scheme.

Historic Vehicles

3.10 Prior to the establishment of the RNPS, the Federation of British Historic Vehicle Clubs requested an exemption for number plates supplied to vehicles constructed before 1 January 1973. This request was carefully considered and rejected for two reasons. Firstly, the view of the police was that the theft of historic vehicles was a small but lucrative activity, which it would be wrong to neglect. Secondly, the greater the number of exemptions, the less complete and effective the scheme would be. This has been considered afresh, but no new factors that would justify a change of policy are apparent.

Recommendation

The supply of plates for historic vehicles will remain within the scope of the scheme.

Show Plates

3.11 A large number of queries and comments have been generated about the supply of “show plates” and their role within the RNPS scheme. Some suppliers claim that their products are “show plates” rather than number plates to avoid the obligations of registered number plate suppliers. We cannot endorse that activity. To do so would be to sanction the acquisition of number plates for illegal purposes under the guise of buying “show plates”.

3.12 A number plate is defined as a plate that displays a vehicle registration mark and is designed to be fixed to a vehicle or trailer. It cannot be further qualified as a ‘show plate’ or ‘not for road use’ as a means of circumventing the legal requirements. The term “show plate” is not recognised in law, and simply stating that something is a “show plate” or issuing some similar disclaimer does not automatically guarantee that a prosecution would not be successful.

3.13 We recognise that there is some confusion in the industry about this issue and propose to amend current legislation to clarify the issue beyond doubt.

3.14 Firstly, we will seek to make it an offence to supply any plate bearing a vehicle registration mark and designed to be fitted to a vehicle or trailer that does not comply fully with the display requirements and British standard as contained in regulations. Whether the supplier intended to sell the plate for road use or for some other purpose would not be relevant. It would be the responsibility of the supplier to ensure that the products they sell meet legal requirements.

3.15 Secondly, we will allow a facility to make exemptions to this rule if required. What we have in mind is to allow the sale of plates that do not meet the display regulations and British Standard provided that the disclaimer is clearly

printed on the face of the plate. The precise wording, its location on the plate and the size and colour of the characters could be contained in legislation. Possibilities for appropriate wording could be “NOT FOR ROAD USE”, or “FOR SHOW USE ONLY”. Your comments are sought on this point, and you should also suggest any other exemptions you feel would be appropriate.

3.16 This would give show plates legal recognition for the first time and allow a legitimate trade in show plates to continue. The alternative to making this or other exemptions is to simply ban the sale of plates that do not conform to the display regulations and British standard in all circumstances.

3.17 Of course it should be borne in mind that plates that do not show a vehicle registration number are not number plates and so are not regulated. An example of this might be a plate displayed by a lorry driver in the cab window with the driver’s name on it. However, if such a plate might be mistaken for the genuine article and is sold as a vehicle number plate, it could be regarded as a counterfeit plate. For example, if a supplier sells a plate with a number that looks like a real registration number, but in fact is not, there could be an offence. This is necessary because motorists could display fictitious registration numbers to make their vehicles untraceable.

Recommendation

Show plates will be given legal status provided that a specified disclaimer is printed on the face of the plate.

Distance Sellers

3.18 We realise that the requirement to obtain original documentation means that suppliers who advertise and sell their product over the Internet have to make special arrangements with their customers. Unfortunately, were we to allow an exemption for this activity, it would completely undermine the purpose of regulating the supply of number plates.

3.19. In reviewing this issue, we have considered whether the regulations really prevent distance selling of number plates as some have maintained. We are satisfied that there is good practice in this sector, so it cannot be said that the regulations prevent the use of IT for commercial purposes. However, we are also aware of many instances where Internet suppliers are not complying with the regulations, and it will be necessary to take appropriate enforcement action in those cases.

3.20 Distance sellers should refer to the proposals for greater flexibility in the area of documentary evidence below. Hopefully this will help to make the scheme more user friendly for suppliers in general as well as the public.

Fleet Operators

3.21 Businesses that buy or assemble plates solely for their own use, rather than to supply to customers are not within the scope of the legislation. We recognise the difficulties of large fleet operators who often order plates in bulk and keep the vehicle registration documents at their administrative headquarters rather than with the vehicle. This was why we made provision for fleet operators to present a letter of authority on company headed note paper with contact details stating that the company holds the registration document (V5) and quoting either the document reference number or the vehicle identification number. Despite this, some fleet companies have either of their own volition or acting on the advice of their suppliers registered as number plate suppliers in order to circumvent the requirement to produce documentation.

3.22 DVLA has the power to cancel registrations from companies that do not fall within the definition of a number plate supplier, and we must guard against any tendency to circumvent the scheme by the simple expedient of applying to register and obtaining a supplier identity number. The registration fee is set to cover the reasonable costs of administering the scheme, and it is not refundable when registrations are cancelled. It should also be borne in mind that making false declarations in a registration application is an offence.

3.23 Having said that, we understand the practical difficulties faced by large fleet operators and their suppliers. We propose to allow fleet operators to register as number plate suppliers as an extra statutory concession provided they are current participants in DVLA’s Fleet Re-Licensing scheme. This qualification is necessary to prevent uncontrolled registration with the potential for abuse that would go with it.

Recommendation

To allow fleet operators that participate in DVLA’s fleet re-licensing scheme to register as an extra statutory concession.

Supplier Obligations

Record Keeping

3.24 Registered number plate suppliers are required to keep records of all transactions. At present, they have to record the method of payment for any plates they sell together with the cheque or debit/credit card number. This has

led to criticism about potentially creating opportunities for credit fraud. We therefore propose to remove this requirement.

Recommendation

The requirement to record the method of payment along with cheque number or credit/debit card details should no longer apply.

Documentary Evidence

3.25 At present a photocard driving licence is the only document that can be used on its own to confirm name and address. Otherwise there must be two identity documents in addition to a third document establishing a connection with the vehicle. The public and suppliers see this as overly bureaucratic and we propose to introduce greater flexibility. Our recommendation is to allow suppliers to confirm both name and address by checking documents from a prescribed list. This could be achieved by checking one or more documents from the list as necessary. The proposed revised list of acceptable documentation is located in Annex C, and comments are welcome.

3.26 We also intend to allow company ID documents to be used when a supplier records a company as the purchaser. As an alternative, it will still be possible to record an employee's details and ask for personal proof of identity.

Recommendations

To expand the list of documentation needed to prove entitlement and identity

To include documents which can be used as company identification.

Greater flexibility to be given for confirming name and address.

Enforcement

3.27 Powers of enforcement reside with the police and persons appointed by local authorities. DVLA does not have direct enforcement powers, but nevertheless we have adopted a proactive approach through co-operation and partnership with the Police and Trading Standards. We have appointed three full – time enforcement officers who work with Police and Trading Standards to follow up complaints and visit premises.

3.28 The value of our partnership with the Police and Trading Standards has been demonstrated with three successful prosecutions resulting in fines of between £400 - £600 plus costs. However, DVLA is determined to improve and strengthen the enforcement effort. We are therefore taking steps to obtain powers for DVLA to enter and inspect premises and bring prosecutions, although we will still work with police and trading standards in a joint enforcement effort.

3.29 At present, local authority enforcement powers in England only extend to unitary authorities or district and borough councils. This means that trading standards officers working for county councils cannot enforce unless they liaise with the relevant district or borough. We intend to rectify obtain power for all trading standards officers to work independently in this field.

Recommendation

To obtain Enforcement powers for DVLA and for English County Councils.

Customer Service

3.30 DVLA processes all registration applications, acknowledges all successful applications, allocates a supplier identity number and issues an information brief to all newly registered suppliers. The one-off fee of £40 covers the administrative and enforcement costs, and enables the Agency to provide a telephone help-line from 9.00 until 4.30 five days a week. We also produce information leaflets and posters, which are available to suppliers on request.

Fee

3.31 We have considered whether to increase the fee for new registrations and also whether to introduce an annual fee. At this point, the one-off fee of £40 per outlet is to remain, but this will be subject to ongoing review.

Recommendation

The registration fee of £40 per outlet is to remain unchanged

Supplier Identity Number

3.32 The register of number plate suppliers is in the public domain and details must be disclosed to anyone who requests the information. DVLA discharges this duty by publishing the register on the Internet. The supplier identity

number (SID) is also included on the Internet. The SID can be used as a point of reference when trawling the register in order to locate a particular supplier. However, concern has been expressed that the SID displayed on the web site gives rise to the possibility of someone pretending to be a supplier in order to obtain plates from another registered supplier by fraudulently quoting a SID number from the register. Suppliers should not rely solely on someone quoting a SID. They should either check the register on the Internet or request further evidence that the customer is a registered supplier. Nevertheless, we intend to remove details of the SID from the Internet thereby reducing the opportunity for fraudulent use. The name and address of registered suppliers will continue to be noted on the Internet and available for public scrutiny.

Recommendation

To remove the Supplier Identity Number from the Internet to make the system more secure.

4. Next Steps

4.1 At the end of the consultation period, the responses will be considered and steps taken to amend legislation. Amendments to regulations and procedural changes will result in revised information being sent to all registered suppliers and published on the DVLA web site. Revised leaflets and posters will also be available.

4.2 We will write to all suppliers giving three months notice of amendments to legislation prior to their implementation.

Regulatory Impact Assessment

4.3 It will be necessary to produce a regulatory impact assessment to accompany any amendments to regulations. The purpose of this is to weigh the expected benefits of the changes against the costs to business and the general public. We must also ensure that the measures apply equitably and fairly.

4.4 We anticipate that suppliers would need to modify their record keeping systems to implement the proposed changes and to ensure that employees are fully briefed. Larger businesses will need to cascade new guidelines to all their retail outlets. However, we would expect the costs to business to be relatively low. It would be extremely helpful if consultees could provide an estimate of the costs they would expect to incur as a result of these proposals. If you believe that your business would incur substantial costs, or that its competitiveness would be adversely affected, please make this clear.

5. Summary of Recommendations

- To introduce legislation to extend the scheme to Scotland and Northern Ireland.
- The supply of plates to vehicles registered for the first time in the United Kingdom is to remain exempt.
- Motor dealers who fit plates to vehicles for onward sale will be exempt from the need to obtain documentary evidence.
- The supply of rear plates will remain within the scope of the scheme.
- The supply of plates for historic vehicles will remain within the scope of the scheme.
- Show plates will be given legal status provided a specified disclaimer is printed on the face of the plate.
- To allow fleet operators who participate in DVLA's fleet re-licensing scheme to register as an extra statutory concession.
- The requirement to record the method of payment along with the cheque number or credit/debit card details should no longer apply.
- To expand the list of documentation needed to prove entitlement and identity.
- To include documents which can be used as company identification.
- Greater flexibility to be given for confirming name and address.
- To obtain enforcement powers for DVLA and English County Councils.
- The registration fee of £40 per outlet is to remain unchanged.
- To remove the supplier identity number from the Internet to make the system more secure.

Annex A : Consultation Criteria

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated Consultation Coordinator.
6. Ensure your consultation follows better regulations best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Annex B: Results of Questionnaire

The Government gave an undertaking to review the registration of number plate suppliers within two years of the date of commencement to determine whether it is meeting its objective and whether changes are needed. As part of the review process, the Driver and Vehicle Licensing Agency (DVLA) has commissioned this questionnaire to canvas views from a selected sample of registered suppliers. The sample is partly based on random selection but we have made sure that businesses of different types and size are included.

The point of this review is to make improvements where they are needed. Our conclusions will directly affect your business, so please help us to help you by completing the questionnaire. Please tick boxes to indicate your views. However, if you wish to include a fuller response to the questions you may do so by completing the comments boxes at the end of each section.

This questionnaire should take 10-15 minutes to complete. All responses are anonymous and are treated in the strictest confidence.

Please indicate your main business activity by ticking one of the boxes below

Number Plate Manufacturer	Motor Factor -	MOT/Accident Repair -	Motor Dealer -	Fleet Operator -	Other -
- 5.4%	14.3%	25.0%	28.6%	10.7%	6.1%

If other, please specify

Heavy Goods Vehicle Manufacture (7.1%)

Section 1

Scope

Since 1 January 2003, number plate suppliers are now legally obliged to register with DVLA if their business activity falls within the following definition: 'any person who carries on a business which consists wholly or partly in selling registration plates and is not an exempt person'.

The exempted activity is where the seller is a dealer in vehicles and has arranged the first registration of the vehicle in the United Kingdom on behalf of the intending purchaser.

Q1. Should motor dealers be included in the scheme?

78.9% Yes 21.1% No

Q2. Should the supply of 1st registration plates be exempted ?

43.9% Yes 56.1% No

Businesses who supply only blank plates or other components or materials, are not required to register. Those who manufacture plates solely for their own use, rather than supplying third parties, are outside the scope of the legislation. Fleet operators fall within this category (e.g. assemble plates and fit them only to vehicles in their fleet).

Q3. Some fleet operators think they should be included in the scheme. Do you think they should be included in the scope of the scheme?

75.4% Yes. 24.6% No

Q4. Should there be an exemption for the sale of yellow rear plates only (e.g. for trailers)?

25.9% Yes 74.1% No

Please add any further comments concerning the Scope of the RNPS scheme in the lines below:

For the scheme to be 100% effective every organisation involved needs to be registered otherwise what's the point as abusers will exploit the loopholes 11.1%

Section 2.

Supplier Obligation

The scheme aims to ensure that a registered supplier only sells a number plate to a purchaser who can provide proof of their entitlement with proof of their identity. When drawing up the list of acceptable documents to be used DVLA tried to draw a balance between security and practicality.

Q5. Do you think the list of documents providing entitlement is:

1.8% Too short 26.3% Too long 71.9% About right

Q6. Do you think the list of documents proving identity is:

3.4% Too short 22.4% Too long 74.1% About right

The photocard driving licence is the only personal ID document acceptable on its own because it is the most secure and widely available document to confirm both name and address.

Q7. Do you think that only one identity document should be acceptable in all cases?

55.2% Yes 44.8% No.

Q8. Registered suppliers are asked to record information when making a sale. Is this information:

0.0% Too little 22.8% Too much 77.2% About right.

Please add any further comments concerning Supplier Obligation in the lines below :

An additional form of identification over and above driving licence should only be necessary if the address shown differs to that shown on the V5 document 10.0%

Section 3

Enforcement

As custodians of the register, DVLA has adopted a pro-active approach to enforcement in England and Wales. It has no legal power to inspect premises and bring prosecutions, but promotes co-operation and partnership with the Police and Trading Standards. This is seen by the appointment of enforcement officers to work with Police and Trading Standards officers who ensure that action is taken to prevent contravention's of the law.

Q9. Do you think the enforcement powers are robust enough to be a deterrent to non-compliance?

56.1% Yes 43.9% No

Q10. Do you think that DVLA should have the power to prosecute as well as the Police and Local Authorities?

52.6% Yes 47.4% No

Q11. Are you content with DVLA's response when reporting non-compliance of registered or unregistered suppliers?

68.8% Yes 31.3% No

Please add any further comments concerning Enforcement in the lines below:

No experience 12.5%

Section 4

Customer Service.

DVLA processes all registration applications, acknowledges all successful applications, allocates a supplier identity number and issues an information brief. The one-off fee of £40 covers the administrative costs, enforcement expenses and also enables the Agency to provide a telephone helpline which is available from 9.00 until 4.30 five days a week. In this section of the questionnaire we are particularly interested in your views concerning the customer service provided by DVLA.

Q12. Do you think the £40 registration fee is reasonable ?

56.4% Yes 43.6% No

Q13. Are you content with the customer service provided by DVLA when :

Yes No

Registering as a supplier? 92.5% 7.5%

Seeking general advice? 76.5% 23.5%

Q14. Are the DVLA leaflets, posters and other sources of information useful?

80.7% Yes 19.3% No

Q15. Is the Register of Number Plate Suppliers information easily accessible?

83.0% Yes 17.0% No

Q16. If amendments are made to the scheme as a result of the review, DVLA will undertake to publicise the changes. Who should it be aimed at ? (Please tick as many boxes as appropriate)

General Public - 28.1% Motor Industry - 26.3% Number Plate Suppliers - 25.7% Manufacturers - 14.6% Other - 5.3 %

If others, please specify

MOT/Accident Repairers 16.7%

Please add any further comments concerning Customer Service in the lines below:

Why would anyone want to look at the Register of Suppliers 12.5%

Section 5

Effectiveness of the scheme.

The list of registered suppliers is displayed on the DVLA web site at <http://www.dvla.gov.uk/vehicles/mps.htm>. The Supplier Identity Number is displayed along with each entry, but it has been suggested that this might be used by criminals to obtain plates.

Q17. Do you think that the supplier identity number should be displayed on the Internet ?

23.1% Yes 76.9% No

Since the establishment of the RNPS scheme, over 30,000 suppliers in England and Wales have registered. This figure will increase when the scheme is extended to Scotland and Northern Ireland. The scheme has introduced some control over the supply of number plates for the first time making it more difficult to obtain false plates for criminal purposes. It is also an offence to sell 'counterfeit' plates that do not comply with the regulations.

Q18. Do you think the RNPS scheme is meeting the industries' expectations?

57.7% Yes 42.3% No

Q19. Do you think RNPS scheme has or will have an impact in reducing vehicle crime?

61.8% Yes 38.2% No

Please add any further comments concerning Effectiveness of the Scheme.

The additional work caused for suppliers is out of proportion to the benefits in reducing false plates 4.5%

Thank-you for completing this survey.

Your response will be used to show us how we can improve our services to you.

Prepared by the Efficiency Support Group, DVLA.

Annex C: List of Documentation

The proposed new list verifying personal details:

- A driving licence whether or not issued in the United Kingdom (with or without a photograph)
- A bill issued by an electricity, gas or water supplier, a land-line telephone bill or a council tax bill
- A bank or building society statement
- A passport (whether or not issued in the United Kingdom)
- A national identity card issued by the Government of a state or territory other than the United Kingdom
- A debit or credit card issued by a bank or building society (the requirement for a photograph would no longer be applicable)
- A travel pass with photograph
- Marriage certificate
- Medical card
- Police warrant card
- Armed forces identity card

In addition to the personal proof of identity listed above we want to provide a facility for a company to provide proof of identity. In this way, either a company name or the name of an employee could be entered in the supplier's record accompanied by the appropriate documentary evidence. The list of company identification as follows;

- Companies House registration certificate
- VAT registration certificate
- Company utility bill
- Bank/building society statement
- Certificate of company insurance
- Letter from Inland Revenue showing company details and tax reference number
- Company mortgage statement

- Property leasing agreement
- Consumer Credit Licence

The proposed new list proving entitlement is as follows;

- Vehicle Registration Document (including the new EU version) this includes V5/2 tear off slip.
- Certificate of entitlement to a mark (V750).
- Cherished transfer retention document (V778).
- Vehicle Licence Renewal (V11).
- Authorisation certificate (V948) from DVLA Local Office with official DVLA stamp.
- An extract from the schedule of vehicles supplied by a hire/leasing company
- A letter of authority from Fleet Operators on company headed notepaper with contact details stating that the company holds the Vehicle Registration Document and quoting either the document reference number or the vehicle identification number.
- Certificate of Vehicle Registration/ temporary export certificate (V573)
- A Vehicle Salvage Certificate (V963) issued by DVLA
- A 'temporary on hire' certificate (VE103)
- A temporary visiting vehicle registration card (V573)

Annex D : List of Consultees

3M

A C G Auto Repairs

A R E Limited

A R Newport Transport

A S G Service Repair & MOT

AA Development Ltd

Abbey Hill Transport Engineering Ltd

Accident Repair Centre

ADR Accident Repair Centre (Wath)

Allparts Automotive Ltd

Allspares (Auto) Ltd

Alton Motor Factor Ltd

Amacord

Ancaster Group Ltd

Andrew Page Ltd

Andy Denton Motor Repairs

Anglian Water Services Plant & Transport

Anthony William Edwards Motor Parts

Approved Car Finance

Aprite (GB) Ltd

Association of British Drivers

Association of British Insurers

Association of Chief Police Officers

Association of Industry Road Safety Officers

Association of Police Officers Scotland

Association of Scottish Police Superintendents

Atkins Transport Management

Auto Body Repair Centre

Auto Repair Centre One Ltd

Autobitz Motor Factors

Autoclenz Ltd

Automotive Parts Distribution Ltd

Automobile Association

Automotive Distribution Federation

Autoplanet Services Ltd

Auto-Technics

B R M Accident & Body Repairs

Balfour Beatty Group Plc Fleet Services

Ballamys Garage (Worthing Ltd)

Inchcape Retail Ltd

Independent Motor Factors Ltd

Institute for Car Fleet Management

Institute of Advanced Motorists

Institute of Registration Agents and Dealers (MIRAD)

Institute of Trading Standards Administration

Ipswich Borough Council

J A Halford Services & Repairs

James of Stokesley

Jayar Components Ltd

JCT 600 Ltd

Jepsons & Co Ltd

Jill Dando Institute

John Grose Group Ltd

Johnsons Cars Ltd

JS & SJ Rose, T/A Llandegai Autospare

Just Car Clinics Ltd

Kar Care Bodyshop

Kensington Car Parts Ltd

Kevin Cooper Motor Factors Ltd

KJA Salvage

L & B Taxis

Lex Commercial Ltd

Linco Plc

Livian Autos (Motor Factors) Ltd

Lloyd Ltd

Local Authorities Co-ordinators of Regulatory Services

Local Contract Line

Local Government Association

Local Government Association (Wales)

London Ambulance Services

Lord Chancellor's Department

Luton Motor Factors

Lythgoe Motors Ltd

M & M Vehicle Repairs Ltd

Madeley Testing Station

Mail Order Traders Association

Banbury MOT & Services Centre
 Banham Vehicle Services Ltd
 Barrys Service Centre
 Ben Burgess & Co
 Berkswell Service Station
 Bestplate Ltd
 Bickerton Garage Ltd
 Blenheim Car Sales & Servicing
 BNC Registrations
 Bolton Car Centre
 Bournemouth & West Hampshire Water Co.
 Bowers of Bolton Ltd
 Brian Kemble Motors Repairs
 Bristol Street Group Ltd
 Bristows Motor Vehicle Engineers
 British Car Auctions Ltd
 British Industry Motor Trade Association (BIMTA)
 British Motorcyclists Federation
 British Number Plate Manufacturers Association
 British Retail Consortium
 British Sign Association
 British Vehicle Rental and Leasing Association
 British Vehicle Salvage Federation
 Brompton Tyres & Exhaust Centre
 Brooklyn Motors Plc
 Bulmers Logistics (Teeside) Ltd
 Bussey & Sabberton Brothers Ltd
 C E M Day Ltd
 Caffyns Plc
 Caledonia Motor Group Ltd
 Camberley Auto Factors Ltd
 Capital Numbers
 Car Care Centre T/A Automaster Car Repair
 Car Magazine
 Car Organisation Ltd
 Carrs Billington Agric Ltd
 Carwatch UK
 Cat Components (Hastings) Ltd
 Cattedown MOT Centre Ltd
 Central Auto Suppliers
 Central Motor Company (Cumbria) Ltd
 Chandlers Farm Equipment Ltd
 Chatworth Motor Spares Ltd
 Christian Salvesen
 Churchill Accident Repair Centre
 Clifford & CO (Sidcup) Ltd
 Clipston MOT Centre
 Collier Motor Group Ltd
 Commercial & Auto Repairs (Bradford) Ltd
 Commercial Motoring World
 Confederation of British Industry
 Confederation of British Industry Northern Ireland
 Confederation of British Industry Scotland
 Confederation of British Industry Wales
 Consumer Association
 Corporate Business & Agencies Division
 Cory Environmental Municipal Services Ltd
 Crynant Plant Ltd
 Cumbria Contract Services
 D A F Ltd
 Dale Building Maintenance Ltd
 Decidebloom Ltd, T/A Stoneacre
 Mainline Tool & Plant Hire Ltd
 Major Motor Services
 Malaya Dealerships Ltd
 Manheim Auctions
 Marshall Motor Group Ltd
 Mercedes Benz Direct
 Mersey Regional Ambulance Service
 Merseyside Passenger Transport Authority
 Mid Wales ATV Centre
 Milcars Ltd
 Mill Auto Supplies Ltd
 Ministry of Defence
 Minit UK Plc
 Mobile Windscreens Ltd
 MOT Centre Reading
 Motest UK Ltd
 Motor Cycle Industry Association
 Motor Trader
 Motorcycle Action Group
 Motorhouse Uk Ltd
 Motorists Discount Centres
 Motorparts Direct
 Motorvation
 Motor World Ltd
 MSM Accident Repairs Ltd
 National Assembly for Wales
 National Caravan Council
 National Criminal Intelligence Service
 National Farmers Union
 National Federation of Consumer Groups
 National Motorcycle Council
 Nationwide Autocentres
 Nationwide Crash Repairs Centres Ltd
 Newtown MOT & Tyre Centre
 Nidd Vale Motors Ltd
 North Thoresby Auto Market
 North Wales Rally Centre
 Northern Car Parts Ltd
 Northern Ireland Office
 Number Plates UK Ltd
 Office of Fair Trading
 Old Square Garage Ltd
 Olds Motor Group
 Otraps Ltd
 Owen Brown Auto Repair Ltd
 P P Plant Hire Ltd
 P Rostron Ltd
 Penzance Crash Repair Centre
 Phil Knight (Trading Standards Consultant)
 Pinco 1555 Ltd T/A Lsuk
 Pitstop (Blackpool)
 Plants and Properties Ltd
 PMA Group
 Police Superintendents Association England & Wales
 Portslade MOT & Service Centre
 Premier Body Repairs
 Prestige Plates
 Pullens Crash Repairs Ltd
 Pullman Fleet Services
 Purdy Auto Repairs
 R C K Service Stations T/A Motorhaven
 R J Osman Motor Vehicle Services & Repairs

Denton Auto Repairs
 Department of Environment Northern Ireland
 Department of Trade & Industry, Small Business Service
 Derwent Vehicles Ltd
 Desira Group Plc
 Disabled Drivers Association
 Disabled Motorists Federation
 Disabled Transport Advisory Committee (DPTAC)
 Discount Autoparts Ltd
 Dixon Motors Plc
 Dobies Cumbria
 Dovercourt Ford
 Drayton Group
 Driver and Vehicle Licensing Northern Ireland
 DRF Auto Imports Ltd
 Eastbourne Motoring Centre
 Eastern Auto Spares (Ipswich) Ltd
 Edwards Car Repairs
 Elham Motors Ltd T/A Hawkings Vehicle Services
 Elite Financial Management Ltd
 Empire Trading
 Eurofleet Ltd
 Europlate Ltd
 Evan William & Sarah Ellen Pritchard, Morfa Garage
 Evolution Auto Parts Ltd
 Exel Europe Ltd
 Experian
 Fabricauto
 F G Barnes & Sons Ltd
 Federation of British Historic Vehicle Clubs
 Federation of Small Businesses
 Ffrydlas Garage
 Finance & Leasing Association
 First Order Motor Factors
 First Select Vehicle Services
 Fleet Audits
 Fleet Factors Ltd
 Fleet Services
 Fleet Solutions
 Fletchers Accident Repair Centre Ltd
 Flyde Coast Accident Repair Centre Ltd
 Foray Motor Group
 Ford and Slater Ltd
 Ford Motor Company
 Formby MOT & Service Centre Ltd
 Forum of Private Business
 Freeth Truck Services
 Freight Transport Association
 Freight Transport Association (Scotland)
 G K Ford
 G M Moss Vehicle Repairs
 G S Unwin Body Centre
 Gammond Transport
 GC Motor Factors Ltd
 Gemini Accident Repairs Centres Ltd
 General Traffic Ltd
 Genius Motorcycle Spares
 Gladstone Garage
 Glanafon Garage
 Glass's Information Services
 Glyn Hopkin Ltd
 Glyn Lewis, Firbank Garage
 R M Eastwood Accident Repair Centre
 Reg Vardy Plc
 Registration Transfers
 Regulatory Issues Directorate
 Rennicks
 Retail Motor Industry Federation
 Ripon Farm Services T/A Ripon Landrover
 Road Haulage Association
 Road Star Cycles
 Rownhams Lane Service Station
 Royal Automobile Club
 Royal Mail Vehicle Services
 RRD Motor Factors
 Russells
 S F Car Repair Co Ltd
 S G Petch Ltd
 Salvesen Logistics Ltd
 Sandhurst Autoprint Ltd
 Sandiccliffe Motor Group
 Sato & Sato LLC Ltd
 Scania (Great Britain) Ltd
 SHB Hire Ltd
 Sheffield Imported Motors Factors Ltd
 Sherburn Rubber Company & MOT Centre
 Sidlow Garages Ltd Sidlow PDI Centre
 Signum
 Silwood Number Plate Components Ltd.
 Slaters Parts Ltd
 Smith Knight Fay Ltd
 Society of Local Authority Chief Executives
 Society of Motor Manufacturers and Traders
 Southcote Road MOT Centre
 Southern Tyre Co Ltd
 Sparesworld Ltd
 Springfield PDI Centre
 St Leonards Motors Ltd
 St Peters
 Stapleton (Tyre Services) Ltd
 Stolen Vehicle Unit, Metropolitan Police
 Story Construction Ltd
 Stricklands Motor Body Repairs & Servicing Special
 Swaythling Car Accessories
 Swindon Motaquip
 T & S Auto Services
 T C Harrison Group Ltd
 T H White Ltd
 T M S Motor Spares Ltd
 Tanvic Spares Ltd
 Tanvik Tyre Distributors Ltd
 Tennants Plastics Ltd
 TG & O Obee T/A Motorline and Drive Line
 The Car Superstore
 The Caravan Club
 The Cooper Group Ltd
 The Hogan Group
 The Motorcycle Industry
 Thompson Accident Repair Centre
 Timpson Ltd
 Tony Smith Motor Repairs
 Top Gear Magazine
 Torbay Car Supermarket
 Tracta Motor Services Ltd

GMF Motor Factors Ltd
Gordon Lamb (Holdings) Ltd
Gotherington Cross Garage Ltd
Gould Autoplates Ltd
Green Flag
Greenhouse Group Ltd
GT Grafix
H M S Commercial Body Repairers & Painters
H S Atec
H W & J E Carter Motors
Hales Waste Control Ltd
Halfords Ltd
Hanover Automotive Ltd
Haydock Commercials Vehicles Ltd
Haydon Gate MOT Centre Ltd
Healing Car Centre Ltd
Hendy Lennox Ltd
Highams
Hills Ltd
Holland Park Ltd
Holt J C B Ltd
Holts Accident Repairs
Home Office
Hove Car Spares
Howard Bashford Ltd
HPI
HWN Auto Spares Ltd

Turners (Soham) Ltd
U G C Ltd
Unipart
Uniplate UK
United Co-Operative Ltd T/A Sunwin Motors
Upwell Body Repairs
Userve Ltd
Vale Tyre, Exhaust & Service Centre
Van Bitz
Vehicle and Operator Services Agency
Vehicle Builders and Repairs Association Ltd
Vehicle Repair Services Ltd
Vigurs (Torquay) Ltd
VW Spares
W F Hall & Son Ltd
Wellington Service Station
West Pennine Trucks Ltd
Western Towing
Westfield Garage Co Ltd
What Car Magazine
Whites Ltd
Wilco Motor Spares Ltd
Winchester Car Centre
Woodley Auto Factors Ltd (Factor Express)
Worcestershire Community Recycling Ltd
Wrights Accident Repair Centre (Derby) Ltd
Yeomans Ltd