



## FLA RESPONSE TO DVLA CONSULTATION ON THE UK VEHICLE REGISTER

FLA is the biggest UK representative organisation for the UK consumer credit and asset finance sectors. Our members include banks, subsidiaries of banks and building societies, the finance sectors of leading retailers and manufacturing companies, and a range of independent firms.

Many of our members are involved in vehicle finance, including the provision of hire purchase, lease and loan facilities, and some are also companies involved in mileage checking and so the consultation document will have a direct impact on members' businesses and has accordingly generated a lot of interest.

### 1. OVERALL COMMENTS

Our members need access to DVLA data for the legitimate purposes recognised in the 'reasonable cause' provisions listed in Annex C to the consultation document. Actual delivery of the data, however, could be improved through online access via the DVLA website. This could be achieved by a registration system for authorised users. Online access would allow immediate access to keeper information rather than the 3 days it currently takes to obtain the data by post. This would appear to be a more efficient method of data delivery both from the user's and the DVLA's point of view.



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## 2. Opinions on questions raised by the consultation document

### Section One: granting access to the register.

Members strongly favour option 3, the mixed approach.

For FLA, the critical entries on the list of bodies whose requests should be granted automatically are finance companies and mileage check companies. We do not feel that it is appropriate for us to comment on the suitability of other organisations.

### Section two: managing access to the register

Members are strongly in favour of option 1, continuation with the current two-tier approach.

We would suggest that, as an additional information requirement, DVLA should check that organisations are on the Information Commissioner's Office register of data controllers.

### Section three: auditing access to the register

To improve awareness and involvement of the vehicle keeper, members have suggested that use could be made of road tax renewals, posters in Post Offices and other inexpensive campaigns. In addition, DVLA could make available on its website a list of companies with approved conditional access.

With regard to the proposals (i) to (v), members are supportive of proposals (i) to (iv) to increase keepers' awareness but consider proposal (v) to be onerous and costly. In addition, writing to every customer i.e. proposal (v), would have potentially serious implications when the data is requested for fraud or crime investigations. Should proposal (v) ultimately be implemented, we would recommend that such cases be excluded from the advice to customers.

Members support the probationary period approach and feel that a period of 20 requests is sufficient.

Members feel that the penalties listed in the consultation document appear to be appropriate.

The level of spot checks suggested by the consultation document of 5% sounds reasonable.

The groups to be targeted, as suggested by the consultation document, should be concentrated on those where there is a high level of concern or high levels of past failure. Groups where there is minimal or no concern can then be audited less frequently.

#### V5C – last previous keeper details

In an additional letter from David Lewis of DVLA, written on 24 February 2006, we were made aware of the intention to remove the above details from the V5C. Members feel that this suggestion is flawed as it obscures the history of a vehicle and potentially makes clocking and other abuses harder to establish. The details also act as an additional ID verification check. We would like to know how many instances there have been of previous keepers being bothered or becoming victims of ID fraud as a result of their details appearing on V5Cs.

There is also a concern over the DVLA's proposal not to advise on whether a V5C is the latest edition unless the document identity number is quoted as this will only serve to slow procedures down and it leaves the matter open to errors in transcription.

### 3. CONCLUSION

As previously stated, members' overriding concerns are that they should retain the access that they currently have to DVLA data for legitimate

purposes, in order that their legitimate business interests should not be impeded.

Members support most forms of audit suggested.

Members hope that an efficient and cost effective service will be maintained.

#### 5. FLA CONTACT DETAILS

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For more about FLA please visit our e-politix micro-site at  
<http://www.epolitix.com/forums/FLA>