



Department for
Transport

Consultation Document

Future of the Vehicle Identity Check (VIC) Scheme

Response from:

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Response to Department for Transport

Executive Summary

The BVRLA welcomes the opportunity to comment on the Vehicle Operator and Services Agency's (VOSA) powers to inspect "written off" vehicles where the cost of repairing exceeds the market value of the vehicle.

We understand the department is seeking to determine the future of the Vehicle Identity Check (VIC) scheme and whether the scheme is fit for purpose. We specifically note that the department is considering whether to: retain the scheme in its present format, re-scope the scheme or abolish the scheme entirely.

BVRLA members fully support the key vehicle crime principles associated with the VIC scheme, namely to prevent criminals from disguising the identity of a vehicle for commercial gain. We note that since the introduction of the scheme in 2002, a total of 38 vehicles have been identified as "ringers" at a cost of £30 million to the motorist. What is not known and we suspect is harder to quantify, is the number of vehicles that have not been caught by the scheme and are being used on UK roads a potentially posing a real road safety risk.

Our concerns with the VIC scheme have always been that the scheme does not check the road worthiness condition of the vehicle which in our view is vital. It is therefore possible that a vehicle could satisfy the identity check, but may have been rebuilt in a dangerous condition or has a serious defect that could be a real threat to ensuring UK roads are safe. We therefore believe that the vehicle should instead be subject to a new roadworthiness check where both the identity and condition of the vehicle can be verified at the same time.

In the light of these concerns we believe that the VIC scheme in its current format should be abolished and as we suggested make a mandatory requirement for the vehicle to undergo a full roadworthiness test before it can be legally used on UK roads. We would also suggest that once a vehicle is deemed a 'write off' it is de-registered by the DVLA and only registered again once the identity check and roadworthiness check are completed.

In addition, we suggest that consideration is given into making the Code of Practice for the Disposal of Motor Salvage (MIAFTR) a mandatory requirement for anyone who is involved in putting written off vehicles back on the road, including salvage agents, insurance companies and those who self-insure vehicles.

Response to Department for Transport

The BVRLA already makes it a condition of its membership that those members who are managing their vehicles losses adhere to the code and we believe by strengthening the code it would further detect and deter insurance fraud and criminal activities.

Specific Comments

- 1) Can you provide figures associated with the costs and benefits of the current scheme (including costs to motorists and business, and effectiveness of the scheme as prevention of car crime)?**

We have no figures associated with the costs and benefits of the current scheme or on its effectiveness other than the figures the department has already highlighted which show that 38 'ringed' vehicles have been identified as non-compliant since the schemes introduction.

- 2) Do you think we should retain the scheme in its present form? Why?**

We do not believe the scheme should be retained in its present form as unsafe vehicles could be legally used on UK roads. We maintain this aspect is vital and that a vehicle which has been written off should not be allowed back on the road without a road-worthiness check taking place first.

- 3) Do you think we should re-scope the scheme? If so, how could it be defined? What criterion would you suggest should be used to determine whether a vehicle should be checked?**

As mentioned above the scheme should be re-scoped to include a road-worthiness check along with the identity check and this should take place for category A-C vehicles.

- 4) Would the use of age as criterion prevent ringing? For the purpose of the IA we have set the age at 3 and under, is this sufficient? What age limit would otherwise be more appropriate?**

We do not believe that an age limit is appropriate due to the fact that older classic cars or vehicles with a high market value would fall outside of scope of the scheme and could result in these vehicles being targeted by criminals as they would be safe with the knowledge that they would not be detected.



Response to Department for Transport

5) Would the pre-accident value of the vehicle be a better suited criterion? Or perhaps the length of time in the same ownership?

Pre-accident value would be a better measure if the department choose to restrict the volume of vehicles required to undergo a VIC test and if this is a route which is decided on we would be happy to conduct further research with our members on an appropriate value.

6) Should the 4 salvage categories be retained as defined? Should they be amended?

We believe the categories should be retained but would suggest that “flood” damage is added as a new category, especially as water damaged vehicles are not currently accounted for in the scheme.

7) Should Category D vehicles also be required to undergo a VIC test?

No, as the risks with this category are small we see no reason for them to be included in the scheme.

8) Do you think there are already other systems acting as deterrent to ringing?

We are not aware of any other systems currently in place which act as a deterrent to ringing.

9) Can you suggest an alternative to deter vehicle ringing?

As we have mentioned in our executive summary, we believe that the MIAFTR code should become mandatory for anyone who is involved in putting written off vehicles back on the road including salvage agents, insurance companies and those who self-insure vehicles.

The BVRLA already makes it a condition of its membership that those members who are managing their vehicle losses adhere to the code and we believe by strengthening the code it would further detect and deter insurance fraud and criminal activities. By ensuring that all vehicles involved in major accidents are reported through MIAFTR we believe that a more transparent picture of the history would be available.



Response to Department for Transport

Closing Comments

We welcome the opportunity to continue our constructive dialogue with the department on the future of the scheme and hope our comments add value to how the scheme can be best used to deter vehicle crime.

Leasing Members

In general, vehicle leasing is an arrangement where the user simply hires the use of the vehicle and assumes operational responsibility for a predetermined period and mileage at fixed monthly rental from the owner (the leasing company). Legal ownership is, in the majority of cases, retained by the leasing company.

Short Term Rental Members

Rental Members offer hourly, daily, weekly and monthly rental of vehicles to corporate customers and consumers. As explained above, rental members are the owners of the vehicle.



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Bona-fides **BVRLA, the industry and its members**

- The BVRLA is the trade body for companies engaged in the leasing and rental of cars and commercial vehicles. Its members provide rental, leasing and fleet management services to corporate users and consumers. They operate a combined fleet of 2.5 million cars, vans and trucks, buying nearly half of all new vehicles sold in the UK.
- Through its members and their customers, the BVRLA represents the interests of more than two million business car drivers and the millions of people who use a rental vehicle each year. As well as lobbying the Government on key issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct.
www.bvrla.co.uk