

Creating a Road Collision Investigation Branch

You

Q1. Supply (used for contact purposes only) your:

name? David Davies
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Q2. Are you responding:

on behalf of an organisation?

Organisation details

Q3. What is your organisation name?

PACTS

Q4. What is the purpose of your organisation?

Parliamentary Advisory Council for Transport Safety (PACTS)

Q5. What is the size of your organisation?

Up to 250 employees

Q6. If a RCIB was established, do you think it would need access to data held by your organisation to investigate causes of road collisions?

No

Why?

PACTS does not hold this sort of data.

Organisation details

Q8. Do you think your organisation would need to spend time familiarising itself with working with an RCIB, should a branch be established?

Yes

Why?

We would want to familiarise ourselves with an RCIB, to understand better its remit, operations, staff etc, how we might cooperate and promote its work. We would look forward to this. It would not be difficult or particularly time-consuming and could be incorporated into our work over the first year or two of an RCIB, then kept up-to-date.

Staff working with RCIB

Q9. What number of staff within your organisation would need to spend time familiarising themselves with an RCIB, should a branch be established?

2-3 staff

Q10. How much time, in minutes, do you estimate it would take your organisation to familiarise itself with an RCIB?

Perhaps 3-4 days in year one.

Road Collision Investigation Branch (RCIB) proposals

Q11. To what extent do you agree or disagree with the creation of a new independent body, the Road Collision Investigation Branch (RCIB), to coordinate the investigation of road traffic collisions?

Strongly agree

Road Collision Investigation Branch (RCIB) proposals

Q15. To what extent do you agree or disagree with the three suggested responsibilities?

Agree

Why?

We agree with the three responsibilities shown but the first one needs to be broadened as follows:

- to have a singular focus on investigating and analysing the causes of collisions and injury;

Add details

We have suggested two additional responsibilities.

Firstly, an RCIB must be directly involved in investigation, at first hand, when necessary. It must not be a glorified research body. In order to have public credibility, for the investigators to understand fully reports and data they receive from other sources such as the police, they need to do a certain amount of investigation themselves. In addition, some aspects are simply not adequately investigated at present and relying on existing reports will not provide around an adequate understanding of the issues and opportunities to avoid future collisions and injury.

The argument that there are simply too many collisions for one body to investigate is not valid. Cases can be triaged and prioritised as happens currently in other AIBs and in the RAIDS2 study, funded by the Department for Transport. As we understand it, the RAIDS2 study involves approximately 200 investigations each year, as well as a substantial research, database management and reporting function, at a cost substantially lower than £5m annual budgets of the Rail and Air AIBs.

Secondly, an RCIB must also consider injury resulting from a collision. In an ideal world there would be no collisions but that is unlikely for the foreseeable future and the important thing is to investigate the causes of death and serious injury, rather than trying to avoid all collisions.

Other responsibilities

Q17. Are there any other responsibilities that you believe an RCIB should have?

Yes

Different responsibilities

Q18. What other responsibilities?

As in previous response.

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In addition, we would recommend that an RCIB takes on the role of collating, and promoting and enabling sharing of safety-related information and data across the various agencies and research sectors. If data can be more readily accessed, while maintaining adequate safeguards, this should enable a much wider range of researchers to work more effectively.

Q19. Why do you think RCIB needs these responsibilities?

Undertaking investigations at first hand, and not simply reviewing data from others, is crucial to its credibility and capacity to understand.

Investigating injury is central to the purpose of road safety.

Road Collision Investigation Branch (RCIB) powers

Q20. To what extent do you agree or disagree with the proposal that the RCIB should have the stated investigative powers?

Strongly agree

Agreement of powers

Q22. Why?

An RCIB should have all the investigatory powers that are provided to existing accident investigation branches. These must include power to interview individuals and/or organisations and collect confidential information. An RCIB will not be able to function properly or add the same value without these powers. Without these powers it would be no more than another road safety research body.

Other investigative powers

Q23. What other investigative powers, if any, do you think an RCIB should have and why?

An additional investigative power that will be required is the power to obtain electronic data, such as that held in vehicle event data recorders and by the OEM or Tier 1 supplier. Currently this is hard to obtain, even for the police. Manufacturers should also be required to co-operate. With the growth of CAV technology, this will become more important and beneficial.

Investigative criteria

Q24. In your view how important is it that an RCIB base investigation criteria on the:

| | Very important | Important | Neither important nor unimportant | Unimportant | Very unimportant |
|-----------------|----------------|-----------|-----------------------------------|-------------|------------------|
| scale? | X | | | | |
| risk of harm? | | X | | | |
| emerging risks? | | X | | | |

Q25. Are there other criteria you think should be included?

Yes

Other criteria

Q26. What other criteria?

This is an important but complicated question. There are many ways in which investigations could be prioritised. We support the three criteria above but they are not exclusive.

An RCIB should focus on the factors involved in collisions and injury which are not currently investigated or adequately reported. (This may be due to limitations in their remit, specialisms, powers, access to data or resources.) For example, while serious collisions involving people driving for work will be investigated in respect of road traffic offences pertaining to the individual driver, investigation of the company's health and safety procedures and responsibilities are less likely.

It will be important to demonstrate value for money, in which case addressing issues which involve large numbers of collisions and casualties would seem important. At the same time, it will be necessary to demonstrate fairness and to address the needs of minority groups. As approximately 50% of road fatalities involve car occupants, there would be a logic in focusing most investigation on car occupants. That however would fail to address social justice and diversity. It will be necessary to consider age, gender, disability, mode and geography and other factors too.

It will also be important to investigate those vehicles or road user groups which present most danger to other road users and result in most harm to others, regardless of fault or responsibility. For example, HGVs, vans and, to a lesser extent buses, are involved of significant numbers of fatal collisions. See PACTS-What-kills-most-on-the-roads-Report.

The criteria should consider the potential for taking effective action as a result of investigation. Collisions involving driving for work, particularly where there is an employer, would lend themselves to action through bodies such as Driving Better Business and the Health and Safety Executive and large insurers of fleets. Road traffic and Health and Safety legislation, driver management technologies (eg telematics), public sector procurement and best practice among employers could all be powerful tools which are not available when trying to influence private road users.

There is also the complication that investigation and learning does not automatically lead to effective interventions. For example, it is well established that speed, alcohol and distraction are major contributory factors in fatal and serious collisions. It is not clear that investigating this in more detail would result in new or more effective interventions. It might however focus more attention on these causes.

Impact on people

Q27. What impact, if any, do you think an RCIB would have on victims of road collisions and their families? Respond with as much detail as possible.

This is an area which needs careful and sensitive consideration. It is not one where PACTS has a great deal of direct involvement. Other organisations such as the police, Brake and RoadPeace and are better placed to advise.

We are aware however that the families of some road traffic victims feel very dissatisfied about aspects of current investigation and are supportive of establishment of an RCIB and improved procedures.

Police family liaison officers undertake important work at present and we would envisage that they would continue to have the primary liaison roll. Other accident investigation branches deal with these challenges and we see no reason why they should not be worked out for road collisions.

Other comments on the RCIB

Q28. Supply any other comments on the potential creation of an RCIB you wish to make.

PACTS support for an RCIB is not an indication of failure by other bodies or researchers. We fully recognise and applaud the excellent work of police serious collision and forensic investigators, professionals in bodies such as the Institute of Traffic Accident Investigators, safety research centres in universities and the private sector, investigations commissioned by insurance companies, Thatcham Research, TRL and many others. PACTS supports an RCIB because we expect it to draw together the findings from these other institutions and identify and fill gaps. It will have an authoritative and independent voice and a remit to report publicly which these other bodies do not.

An RCIB should liaise with the Chief Coroner to advise on the need for Prevention of Future Death reports and how the work of RAIB and coroners can be most usefully integrated.

Like any new institution, an RCIB will take time to establish to recruit staff, to clarify its remit and operational arrangements, and other such things. We would not expect it to undertake very much investigation in the first year or two. A first priority might be establishing arrangements for access to data and sharing.

We have not attempted to calculate the economic value or rate of return from an RCIB. Because this is dependent on so many factors it is hard to calculate. However, we are confident that the RAC Foundation RCIP report will demonstrate that an RCIB would be excellent value for money. Additionally, TRL has shown us its calculation in its consultation response, and we are happy to endorse it. At a very simple level, given that the official value of prevention of a single fatal collision is approaching £2m, it seems inconceivable that an RCIB with an annual budget of approximately £5m would not generate a substantial rate a return within a few years.

An RCIB must not be at the expense of existing investigation or research effort, such including police, RAIDS or road safety research grants.

The establishment of an RCIB is an opportunity for the UK to show global leadership, to contribute to the second UN Decade of Action for Road Safety, the Global Goals for Sustainable Development and to support LMICs which have very high levels of road casualties but far less resource for detailed investigation. It would also assist the substantial commercial road safety sector to remain world leading, for example members of ITS(UK) Enforcement Group.

We have emphasised the need for an RCIB to undertake investigation, as its name indicates, and not be a research body. It is worth noting that in rail, accident investigation is undertaken by the Rail Accident Investigation Branch while research is undertaken by the Rail Safety Standards Board, Health & Safety by the ORR and criminal investigation by the British Transport Police. Since these bodies and roles were established the safety record of UK railways has been generally excellent.

An RCIB should liaise with the Chief Coroner over priorities for Prevention of Future Death Reports and ways in which the outputs from the RCIB and coroners can be combined to best effect.