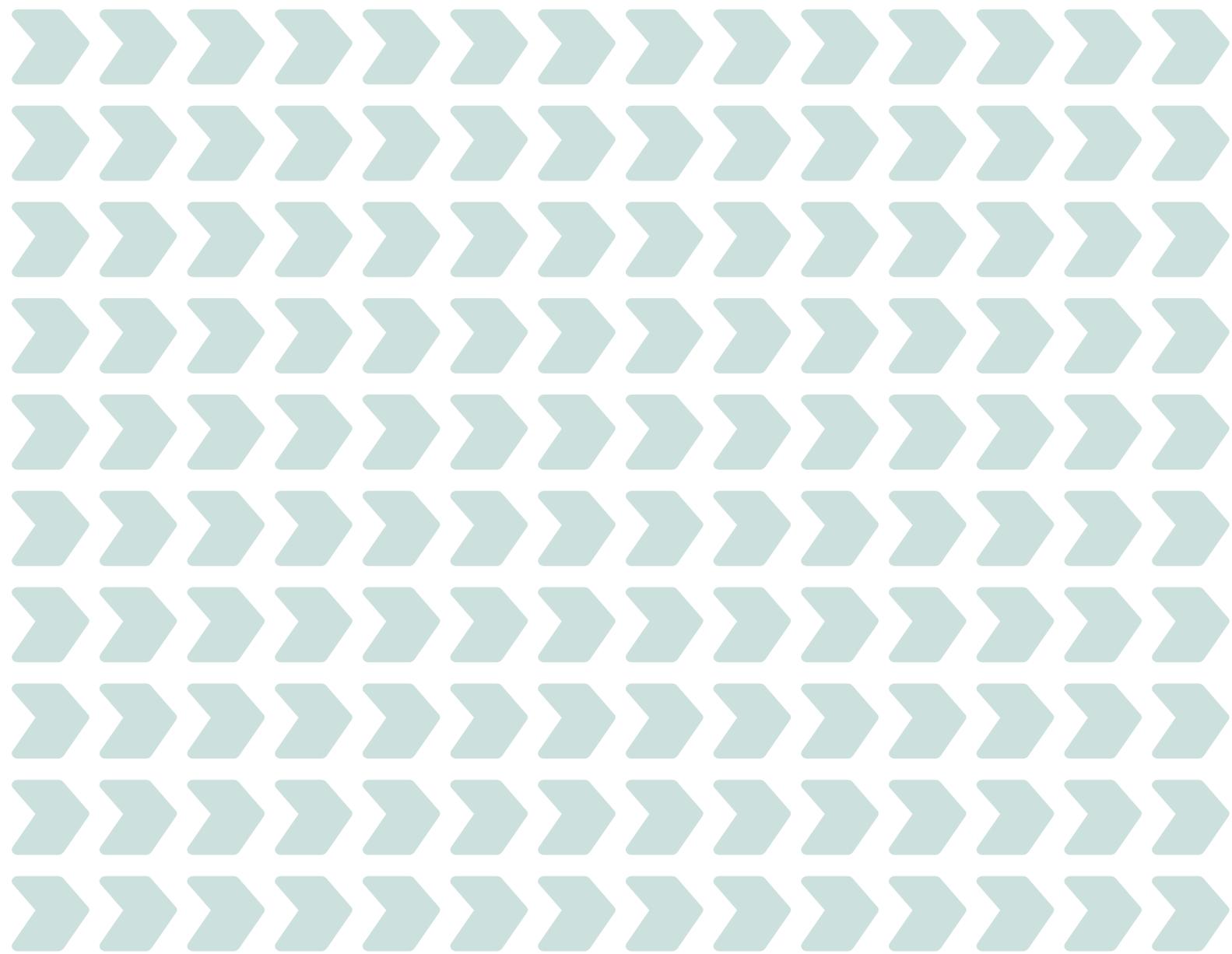




Department
for Transport

Roads Policing Review Call for Evidence

Response form



1. Introduction and data protection

Thank you for responding to the Roads Policing Review Call for Evidence, including questions on hands free use of mobile phones. Your views will help shape what the future of roads policing enforcement might look like: the who, the how and the governance of enforcement.

Please respond on or before the closing date specified on the website, to RPCallforEvidence@dft.gov.uk.

If you need alternative formats (Braille, audio CD) you should email us at RPCallforEvidence@dft.gov.uk.

The Department for Transport (DfT) is carrying out this call for evidence as we are seeking to identify how the use of existing enforcement capabilities, and any enhancement of these, will deliver the biggest impact for road user safety primarily but also congestion management and the environment.

We are asking for your views on:

- the current situation in regards to road casualties and what can be done to reduce them
- driver compliance with road traffic law and enforcement
- the structure of traffic law enforcement in the future

If you are responding for an organisation we also ask that you:

1. make it clear who the organisation represents
2. how the views of members were assembled

This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contains any information, including the email address itself, that allows you to be identified, DfT will, under data protection law, be the controller for this information. You do not have to give us this personal information but if you do we will only use it only for the purpose of asking follow-up questions.

DfT's privacy policy has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed.

2. Responding

1. Your name and email address. We will only use this if we need to contact you to ask about any of your responses and to update you when we publish our response.

Name	David Davies
Email	david.davies@pacts.org.uk

2. Are you responding: *

<input checked="" type="checkbox"/>	On behalf of an organisation?
<input type="checkbox"/>	As an individual?

3. Organisation details: *

Company/Organisation Name	Parliamentary Advisory Council for Transport Safety
Address	78 Buckingham Gate, Westminster, London
Postcode	SW1E 6PE
Email	david.davies@pacts.org.uk
Your Role / Position	Executive Director
Please tick one box below that best describes your company or organisation.	
<input type="checkbox"/>	Micro business (0-9 employees)
<input type="checkbox"/>	Small business (10-49 employees)
<input type="checkbox"/>	Medium business (50-249 employees)
<input type="checkbox"/>	Large Company (250+ employees)
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input checked="" type="checkbox"/>	Other (please describe): NGO

If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:

PACTS has 100 members which are all organisations – see our [website](#). This submission largely reflects the evidence and conclusions in our report [Roads policing and its contribution to road safety](#), published June 2020. That report was based on a year of research (data, literature, interviews and consultation etc) and feedback from PACTS members and the advisory panel that we established.

3. Call for Evidence questions

The questions below may not apply to all respondents. Please answer as many as are applicable to you or your business. In each case please set out the reasons for your answer and if applicable, alternative proposals.

Call for Evidence questions

Q 1 - Why do you think road casualties have remained fairly constant since 2010?

Response:

It has never been possible to provide conclusive proof of what determines changes in the aggregate number of road casualties. RRCGB each year includes a list of significant road safety interventions, such as compulsory seat belt wearing, that the DfT believes have contributed to the long term trends (mostly a reduction) over the past decades. Parallel changes in non-road safety factors, notably population, traffic, young drivers, the economy, fuel prices etc, also have powerful influences on casualty numbers - sometimes helping, sometimes not.

Regarding the plateau (stagnation) of deaths and serious injuries since 2010, the following are almost certainly relevant:

- The rebound after the dramatic reductions in road deaths during the 2007-2009 recession, as economic growth and traffic levels returned;
- The lack of an ambitious, comprehensive, adequately funded national road safety strategy;
- An over-reliance on education, publicity and social media campaigns, while downplaying the importance of road safety highway engineering, vehicle safety, enforcement of road traffic laws, employer responsibilities for driving at work and collision investigation;
- The absence of a national casualty reduction target and lack of guidance or funding for local authorities. This has led to a severe cutback in local authority road safety activity, particularly safety engineering. Although heralded as localism and devolution, in practice local authorities have not been free to set local priorities as tightly-defined statutory responsibilities and standards/targets, backed by inspection regimes, notably for child protection, adult social care and air quality, have inevitably focused management attention and council spending on these areas. This completely ignores the scale of local road death and injury.
- That said, once the initial “bounce back” from the recession had played out over the early 2010s, one might have expected the long-term downward trend in fatalities to continue. After all, there has been significant investment in the SRN, vehicle safety standards have risen as newer vehicles with better safety features replace older ones, and various other safety improvements have been implemented.
- It should also be noted that the Governments of Wales and Scotland have set ambitious targets and made use of devolved road safety powers. For example, Scotland reduced the drink drive BAC limit.
- Of the “three Es” of road safety, the one that has most clearly been cut back is Enforcement. Whilst use of safety cameras has expanded, the level of roads policing by officers for road safety purposes has been substantially reduced. As such, there are grounds to suspect that this is a major factor in the lack of progress in casualty reduction over the past decade.

Q 2 - What does the evidence suggest has the most impact on reducing deaths on the road?

Response:

Highway infrastructure

- There is good evidence to show that engineering improvements in the safety of highway infrastructure can have a substantial and long-term impact of reducing road deaths.
- For major roads (speed limits of 50mph and above), changes to roads and roadsides have proved effective, as shown in the IRAP and EuroRAP assessments.
- For local roads (speed limits below 50mph), engineering measures to reduce vehicle speeds, such as speed humps and other traffic calming techniques, have shown substantial and long-term casualty reduction benefits. These were evaluated in the Urban Safety Management trials in the 1980/90s and subsequently – see, for example, Mackie A M, H A Ward and R T Walker (1990). Urban safety project 3: Overall evaluation of area-wide schemes. TRL Report RR263. TRL Limited, Crowthorne.

Vehicle Engineering

- Improvements to occupant protection (seat belts, air bags, crumple zones etc) also have a major impact on reducing road deaths. Standards have been raised as a result of legislation, encouragement through NCAP testing and automotive industry innovation. This may explain why the vehicle occupant deaths have declined more quickly than vulnerable road user deaths over the past 10-15 years.

Enforcement

- Measures to enforce traffic and other road safety laws can have a substantial impact. We elaborate the answers below.

The Safe System approach

- Although we highlight above the most effective measures, a holistic, safe system approach is needed for measures to be effective. “Cherry picking” is not the solution. For example, seat belts have been an outstandingly successful vehicle safety innovation. But it required legislation to get the majority of drivers to use them and still requires police enforcement to make the legislation effective. It also required education and publicity campaigns to raise public awareness, win acceptance, and reinforce positive behaviours.

Q 3 - What evidence led initiatives demonstrate what could be done to help reduce road traffic casualties?

Response:

More of the interventions set out on Q2 above would deliver additional benefits.

- A major opportunity is the General Safety Directive which the UK signed up to before leaving the EU. This will be a paradigm shift in vehicle safety standards, particularly benefiting vulnerable road users as it will include Independent Speed Assistance and Autonomous Emergency Braking that detects pedestrians and cyclists. TRL has estimated for the EC that the GSR could reduce deaths by 25,000 across Europe between 2022 and 2037. See <https://op.europa.eu/en/publication-detail/-/publication/ed4aff17-49c5-11e8-be1d-01aa75ed71a1/language-en>
- The potential to reduce deaths and serious injuries on the major road network in the UK is set out by the Road Safety Foundation in <https://roadsafetyfoundation.org/looking-back-moving-forward/>
- Various bodies, including the UN and WHO, have endorsed 20mph/30mph as the safe speed for urban areas where pedestrians and cyclists are not segregated from motor vehicles. Lower speeds have the potential to deliver substantial casualty savings, as demonstrated in the Urban Safety Management schemes. However, the reduced limits will need measures to encourage and enforce compliance, such as ISA, traffic calming, police and speed cameras, as well as behaviour change campaigns.
- Improved enforcement of traffic laws could also contribute. This could be made more effective by a number of strategies, including improved intelligence and data sharing, better targeting and planning of operations (as recently demonstrated by the Met Police), better exploitation of technology and more use of video evidence from the public. We explain more below.
- Seat belt wearing rates, particularly in the rear passenger seats, remain surprisingly low|: around 1 in 5 adults in England do not wear a seat belt in the rear passenger seat. In addition to this, despite the high wearing rates in front seats, research shows that the impact on casualties from improving wearing rates from around 98% to 100% would be substantial.¹

Q 4 - Can you provide examples or empirical evidence demonstrating a relationship between road traffic law enforcement and compliance with road traffic law?

¹ Hoye, A. (2016). 'How would increasing seat belt use affect the number of killed or seriously injured light vehicle occupants?' Accident Analysis and Prevention, 88(1), 175-186.

Response:

We have set out comprehensive evidence of the effectiveness of road traffic law enforcement in relation to compliance in the PACTS report *Roads policing and its contribution to road safety*, published June 2020.

This demonstrates a general relationship between enforcement levels and compliance trends, with detailed evidence of the Fatal Four offences, in the UK and internationally.

It shows that where enforcement activity has been strongest in GB, notably speed enforcement using cameras and backed by fines, penalty points and speed awareness courses, compliance trends have been better than in the areas where enforcement levels have been cut back (drink drive and seat belt wearing).

It is important to also consider the counterfactual: what would happen to compliance levels and casualties if enforcement was reduced or absent?

We provide more details in Q 5 below.

Q 5 - Can you provide any examples or empirical evidence identifying a causal relationship between enforcement and road collision casualty numbers?

Response:

Speed enforcement

Research literature on speed enforcement is extensive.

Technology-led enforcement techniques, specifically speed cameras, are shown to have the most impact on reducing death and serious injury out of the available methods.

Spot speed cameras have been in use since 1991. In 2010, Wilson et al. assessed thirty-five controlled before-after studies of speed cameras and found relative reductions in fatal and serious injury collisions ranged from between 11% and 55%.²

The RAC Foundation found that that average speed cameras (ASC) systems are effective in reducing collisions, especially those of a high severity. It analysed 294km of roads covered by 25 average speed cameras. On average, permanent ASC sites saw reductions in fatal and serious injury collisions of 25%-46% and reductions in personal injury collisions of 9%-22%.³

In Great Britain, the number of people killed in collisions where 'exceeding the speed limit' was listed as a contributory factor fell between the years 2014 to 2018 (most recent statistics). Simultaneously, there has been a steady improvement in compliance with speed limits in recent years, according to official traffic counter statistics and national compliance surveys.

Furthermore, the only fatal four offence which has seen an increase in the number of penalties issued is speeding: 32% more FPNs for speeding offences were issued in 2018 than 2011, and the number has been increasing year-on-year.

Whilst it cannot be said for definite trends suggest that increased enforcement (as indicated by the increase in FPNs) may have helped to raise compliance with speed limits and reduce fatalities in speed-related collisions.

Drink drive enforcement

International literature shows enforcement of drink-driving laws can also have a significant impact on death and serious injuries on the roads. Results from meta-analyses of drink-drive enforcement studies show that on average, enforcement which involves officers stopping drivers selectively at a 'sobriety checkpoint' can be associated with reductions in fatal collisions of between 20% and 26%.⁴ Literature suggests that using 'random breath testing' at checkpoints can be slightly more effective. However, random breath testing is not permitted in England, Wales or Scotland.

Without reference to specific methods of drink drive enforcement, there is research to support the view that enforcement of drink driving laws generally can lead to a reduction in fatal accidents. A European meta-analysis, conducted as part of the ESCAPE project and based on 26 studies, suggested that increased enforcement of drink driving laws contributed to a decrease in drink driving deaths and injuries. The meta-analysis results, which were statistically significant, estimated that the effects of enforcing drink drive laws were reductions of 9% and 7% in the number of fatal and all injury collisions respectively.⁵

Seat belt enforcement

In the event of a collision, wearing a seat belt is the single most important safety factor.⁶ Evidence shows that if an individual wears a seat belt, they reduce their risk of fatal injury by 45% and risk of moderate to critical injury by 50%.⁷

Although there are no studies which directly measure the impact of seat belt enforcement on fatal casualties, there are studies which show enforcement can improve wearing rates, and separate research which shows that improving wearing rates can reduce the number of fatal injuries on the roads.⁸

Lack of evidence

There are areas and methods of enforcement that have not been much researched, often due to practical difficulties. The impact of the enforcement of drug driving laws, as well as enforcement of mobile phone use laws, for example, is not well evidenced within the literature. This does not mean enforcement is ineffective – only that research is lacking.

Q 6 - Can you provide any evidence or examples that road traffic enforcement can disrupt or detect other (non-motoring) criminality?

Response:

The overlap between failure to comply with road traffic laws and other (non-motoring) criminality is strong. This is also shown in the PACTS report. Particular examples are drug driving and involvement in wider criminality – see pp84-87.

Q 7 - What else alongside enforcement (such as education or examples of use of technology and signage) has been evidenced to increase compliance?

² Wilson, C., Willis, C., Hendrikz, J.K., Le Brocque, R. and Bellamy, N., (2010). Speed cameras for the prevention of road traffic injuries and deaths. Cochrane database of systematic reviews, (11).

³ Allsop, R., Owen, R., Ursachi, G. (2016) The Effectiveness of Average Speed Cameras in Great Britain. RAC Foundation

⁴ <https://www.pacts.org.uk/wp-content/uploads/Roads-Policing-Report-FinalV1-merged-1.pdf>

⁵ Elvik, R (2001) Cost-Benefit Analysis of Police Enforcement. The Escape Project

⁶ <https://www.pacts.org.uk/wp-content/uploads/Final-Full-Web-Version-16.05.2019.pdf>

⁷ <https://www.nhtsa.gov/risky-driving/seat-belts>

⁸ <https://www.pacts.org.uk/wp-content/uploads/Final-Full-Web-Version-16.05.2019.pdf>

Response:

We include technology in our assessment of enforcement above. Technology such as safety cameras, ANPR cameras, Smart motorway Red X cameras, variable message signs, etc have been evaluated and shown to increase compliance. Digital breath test screeners, DrugWipes, video recordings submitted by the public, are increasingly being used to prosecute drivers for traffic offences.

Alcohol interlocks have proved effective at preventing convicted drink drivers from repeat offending, at least while the interlock is fitted. There are numerous studies from the USA and ETSC has summarised the experience of some European countries. <https://etsc.eu/alcohol-interlocks-and-drink-driving-rehabilitation-in-the-eu-guidelines-for-member-states/>

Education alone (and we include publicity and training) has a limited impact but delivered in the correct way, in conjunction with other interventions (notably enforcement), it will amplify the driver's perception of enforcement levels and enhance public acceptability and compliance.

Q 8 - How have improvements in design and technology of vehicles (such as collision avoidance systems) impacted upon road safety?**Response:**

See Q2 & 3

Q 9 - In respect of commercial vehicles can you provide any evidence or examples that current levels of enforcement by police and / or DVSA and the sanctions that follow are an effective deterrent to encourage compliance?**Response:**

We do not have specialist information on this issue. However, we believe it is a vital area and believe that initiatives such as CLOCS, DfBB, the London Freight Enforcement Partnership, Operation Tramline and others have been valuable.

We welcome the increased involvement of the HSE in addressing driving for work, including its load security trials.

Q 10 - If not, can you provide any evidence or examples of how enforcement or sanctions could be changed to achieve improved compliance?

Response:

See Q9

Q 11 - Can you provide evidence or examples of where enforcement of road traffic law can benefit congestion management and air quality?

Response:

We do not have specialist information on this issue.

Q 12 - Is there evidence to show how prosecutions contribute to road safety?

Response:

An effective prosecution regime, including adequate penalties, is vital to the credibility of enforcement.

The level of penalties is generally not very influential on compliance levels unless it seen as clearly inadequate. The penalty for not wearing a seat belt is an example. <https://www.pacts.org.uk/2019/04/pacts-launches-new-report-seat-belts-the-forgotten-road-safety-priority/>

Q 13 - Can you provide evidence or examples (in particular the use of technology) of what could be done to better enable and equip those charged with enforcing traffic laws?

Response:

Much more use of technology not only to enforce laws but to provide the police and others with information on compliance levels, patterns etc. For example, camera-based survey of seat belt and mobile phone use.

MEBTI is a well-known example.

<https://www.pacts.org.uk/2020/08/mebti-stage-3-further-incentives-to-develop-roadside-evidential-breath-testers/>

Q 14 - Can you provide evidence of existing approaches to enforcement or available technologies that could inform the future shape of road traffic enforcement by police and other agencies?

Response:

We set out in our report the need for more targeted, intelligence-led and better planned enforcement activity.

We would like to stress the importance of good victim support services, as provided, by Brake, RoadPeace and the TfL Sarah Hope Line. These are valuable to victims of road trauma and their families. They know that they exist assists the police in serious collision investigations. We believe that they are much valued by the victims and strongly supported by PCCs. They also offer excellent value for money, relieving pressure on public services.