# STATS19 Review – PACTS response to 2021 consultation

[STATS19 review: 2018 review (publishing.service.gov.uk)](STATS19 review: 2018 review (publishing.service.gov.uk))

## Q1. Do you agree the scope of STATS19 remains unchanged as initial judgement of the officer at the scene?

We do not agree.

We have given this issue considerable thought. In our view, where more accurate information is available in a timely manner from a reliable source, the data entered by the officer at the scene (based on his /her impression) should be corrected in the STATS19 record.

We have come to this view for the following reasons:

1. Regardless of the caveats published in relation to STATS19 data, the reality is that it treated as definitive. It is the most comprehensive, widely available, and frequently used data set for local authorities, the police, academics, the media and others. To most users, the STATS19 database is *the* definitive set of information and the only one on which they can readily base their detailed or local analysis. As such, we think the overriding priority should be to make it as accurate as possible.

2. Even when more accurate data are made available – such as the estimates of casualties involving a driver over the legal drink driving limit – these will be published considerably later and will not have local area data.

3. We question the overriding principle of "methodological purity" – that STATS19 is purely information collected from first impressions of the police officer attending. We don't think this is actually true and either way we feel this is less important than accuracy.

4. It is clear that under current arrangements, STATS19 data (as finally published) is not purely the result of the entries by the officer at the scene. The data is frequently checked, refined and corrected by others. We understand that some local authorities have a role in this process in assisting the police. The DfT themselves check the data for accepting it.

5. We made inquiries of a number of police forces in relation to seat belt wearing data which has been reported in fewer than 50% of STATS19 cases until recently. Several local authorities and police forces told us that they already share the forensic collision investigation findings with STATS19 in order to improve accuracy for specific variable. Others thought it was a good idea. Given that it is the same police force that will be dealing with the data and this is a factual matter where the forensic collision investigation team is much more likely to be able to establish the facts, this seems sensible and desirable.

6. We therefore suggest that for fatal collisions which are very likely to be investigated by the police forensic collision investigation team, the option to correct specific data, including seat belt wearing, alcohol and drugs, estimates of speed, mobile phone use, suicides and illness should be permitted in the STATS19 process. These cover the fatal 4/ 5 where it is particularly important that accurate data is available.

7. Currently, it is not. Seat belt data is under reported, while drivers under the influence of alcohol or drugs are significantly under-reported in contributing factors when compared to subsequent more thorough investigations. This is not the fault of the reporting officer; it is simply not possible to make these judgments accurately in the short time available. Any such corrections to STATS19 should be subject to time limits and an audit trail. They should not delay the submission or publication of data. This should be much easier under the new CRASH reporting system.

## Q2. Do you that all forces should collect additional information on: a. seatbelts? b. cycle helmets?

Yes, we support this in principle. We have some concerns about the accuracy of seat belt data as, in slight injury collisions, the driver and passengers will probably have excited the vehicle or put on their seat belt after the collision. This should be monitored.

## Q3. Do you agree that journey purpose should be maintained and aligned with the DfT National Travel Survey?

Yes, we support this as occupational road risk is an area that deserves more attention. We have some concerns about the accuracy of the data – given the complexity of employment arrangements in the delivery sector – employees, gig workers, etc. This should be monitored.

## Q4. Do you agree that a new category of "powered personal transporter device" be added to the vehicle list?

Yes, we agree.

Electrically-Assisted Pedal Cycles (EAPCs) – those limited to 15.5mph and which require the rider to pedal - are legally defined as bicycles and any collisions involve them should continue to be categorised as pedal cycles. We say this principally because their safety performance is the same or very similar to pedal cycles whereas the safety performance of powered personal transporters is unknown and we suspect that for some it will be inferior.

## Q5. Do you agree that a new set of Road Safety Factors be collected, that have been reduced to remove duplication or unused categories, and that align with the Safe System pillars?

Yes, we support this. It will be important to make clear however that the contributory factors will not cover the full range of the safe system pillars. They will inevitably focus on the user safety and possibly speed. The important aspects of infrastructure and vehicle safety will be much less readily identified through STATS 19.

## Q6. Do you agree that ethnicity should remain out of scope of STATS19?

This is another question to which we have given considerable thought. As ethnicity is collected in relation to a large number of public policy matters and by the police for many offences and incidents, in some ways it seems strange to omit it from STATS 19. On the other hand, if it was collected inaccurately or used without adequate care, misleading and unhelpful conclusions might be drawn. There is high degree of overlap between ethnicity and social and economic deprivation factors and ascribing differences to ethnicity might be unhelpful and misleading. We recommend that this is given more thorough study.

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