



From the **AA**. Driven to keep people safe

DfT Roads Policing Open Consultation – 5th October 2020

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About DriveTech

DriveTech is the UK's largest provider of driver education within the public and commercial sector. We deliver NDORS (National Driver Offender Retraining Scheme) speed awareness courses and other driver rehabilitation courses on behalf of 12 police forces and Transport for London. These courses are delivered to drivers in England, Wales and Northern Ireland.

DriveTech also offers a comprehensive range of fleet risk management solutions and driver and road user safety training that helps ensure businesses stay compliant with the law and their duty of care as well as keeping drivers safe and efficient. DriveTech operates in the UK and internationally in over 95 countries through over 40 driver training partners.

DriveTech is a wholly owned subsidiary of the AA plc – the UK's leading motoring organisation.

Find out more at www.drivetech.co.uk.

Summary

DriveTech have a vested interest in improving road safety and plays a significant role in training high numbers of vehicle users (circa 500,000 per annum) – to observe good practice and safe road use. In the instance of driver-offender retraining, this is to help educate and inform in order to change driver behaviour. This is more effective than punishment through fines. Research conducted by the DfT (MORI Report, May 2018) confirmed that driver behaviour improves as a result of this training, and recidivism in the subsequent 6 months post intervention reduces by 29%.

DriveTech also trains business road-users both in the UK and internationally. The under-pinning need for this is to ensure organisations comply with Health & Safety legislation, enables them to demonstrate a clear duty of care to their employees, help reduce collisions and reduce unnecessary costs and ultimately save lives.

On the three road safety "E"s of education, engineering and enforcement, DriveTech has focused its response on the educational and behavioural aspect: training to improve knowledge, risk appreciation and driving behaviours is essential. The key is to provide professional, high quality, accessible training interventions that drivers should be encouraged to experience post licence-acquisition and throughout their driving lives.

With a current stall in the road casualty reductions year-on-year in this country, DriveTech are keen to see new roads policing initiatives that will benefit road-users and society as a whole, and certainly want to support the driving down of road casualties and road deaths.

Policing our roads is vital, but we are philosophical and recognise that this cannot be exclusively left to the Police in isolation. Meaningful partnerships are key - and that means the private sector, academia, the third sector and statutory bodies all working together to make the roads policing challenge manageable and realistic. Increases in people resources would be welcomed, but as one of

these partners, DriveTech sees great opportunity for increased collaboration and sharing the load with current industry-wide resources to call on.

DriveTech was recently awarded a contract to work with the Safer Roads Partnership in South Yorkshire (SYSRP) for the next 12 months, via Sheffield City Council, to deliver impactful and behaviour changing driver training interventions to a 17-24 young novice driver group – statistically confirmed as the highest risk driver segment. This cohort also seeks to target harder to reach young people. We are enthusiastic and committed to measure the success of this project from the outset (engaging independent academic researchers from the Roads Policing Academic Network - RPAN) to understand what difference it can actually make, and to explore other opportunities to support local roads policing and enforcement with behaviour change driver training more broadly across different force areas. One area we believe will help with Roads policing is the sharing of best practice – if our scheme with SYSRP is proven to be effective, it will be very disappointing not to see this rolled out as a national programme.

DriveTech actively supports awareness and behaviour changing campaigns both under the government's THINK! road safety campaign umbrella, and with other similar campaigns such as the AA Charitable Trust's own mobile phone distraction and drowsy driver campaigns and other programmes such as Brake's Road Safety Week, and Project EDWARD.

The road traffic landscape will look very different in a surprisingly short space of time as technology breakthroughs and new transport modes emerge, with autonomous or semi-autonomous vehicles, micro-mobility vehicles, smart cities all creating a whole new, more complex situation for the police to control. As well as responding to the challenges of today, we need to anticipate and deal effectively with this rapidly evolving picture and help the police in keeping an effective pace with this change.

DriveTech are currently working with a number of new e-scooter (UK public rental trial) providers to ensure that this novel personal mobility addition to roads and cycle lanes (and NOT pavements) does not worsen the situation for road safety, collisions and deaths. This is through educational and informational programmes to educate potential users on how to use e-scooters safely and responsibly. We hope our work will support and help roads policing rather than create an additional "less well regulated" issue to confront, manage and police.

Consultation Annex A: full list of consultation questions

(NB: We do not expect you to submit evidence or views in response to every question listed if not applicable).

Question 1

Why do you think road casualties have remained fairly constant?

A lack of specific road safety targets at both a national and regional level over the last ten or so years has meant that casualty reduction has not received the emphasis, profile or priority that it should relative to other policing challenges e.g. knife crime. This, combined with a general reduction in police resources resulting in a reduction in visible operational roads policing, has had a negative impact on driving behaviour and driver's respect and fear of the law.

All of the fatal four referenced in the response to question 2 can be seen to have a contributing role, and arguably we have seen a rise in these detrimental factors, played off against the more modern and safe, technology loaded vehicles being manufactured. Of particular concern is the lack of an educational alternative for mobile phone offences that continue to rise and form the most concerning risk amongst the distraction offences.

Local Police & Crime Commissioners (PCC) priorities have broadly focused on communities, vulnerability, neighbourhood policing and signal crime such as knife related crime. The National Police Chiefs Council (NPCC) have set out in their last two delivery plans a 2025 policing vision with the following mission:

'To make communities safer by upholding the law fairly and firmly, preventing crime and antisocial behaviour, keeping the peace, protecting and reassuring communities: investigating crime and bringing offenders to justice'

In particular, reducing crime and protecting the vulnerable are seen as core priorities and there are five stated objectives:

- Local policing
- Specialist capabilities
- Workforce
- Digital Policing
- Business enablers

The language does not necessarily exclude roads Policing nor does it name it explicitly as the key elements of business are around organised crime, management through Brexit, neighbourhoods and so on. All noted as significant programmes.

However, the generalised view of road casualties remaining constant is also a feature in that the lack of a rise suggests it isn't an emerging risk or signal event that the community will have an expectation around - at least at this moment in time.

There is early indication that driver standards and behaviour are getting worse, particularly through this COVID pandemic, and local expectations around the police response are starting to emerge - DriveTech would expect Crime Commissioners to build in some priorities around road safety dependent on geography and demographics if they do see localised increases in casualties.

Question 2

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

The 'fatal four' is a simple but still totally valid summary of the key causes or contributory factors to road deaths: Drink & Drug Driving, Non-wearing of seatbelts, Inappropriate speed, and Driving while distracted. Campaigning on these four key platform messages in a compelling and behaviour-changing way is vital. All road deaths can be put down to human error and so all are avoidable. Driver (and passenger) education and re-education are critical.

This data could be cross referenced with antecedent, casualty and wider police systems (PNC etc) to extrapolate direct intelligence around the impact of road safety training. At the moment this data is not shared routinely so most schemes in operation - YDS, speed awareness, advanced driving, etc, rely on generalised data although even on this level all indications are that education is significantly more safety and cost effective than enforcement. Diversionary activities, restorative justice and early intervention are common across crime families with many studies and evaluations demonstrating reductions in reoffending.

It also needs to be acknowledged that telematics, insurance schemes, technology advances in car manufacturing and electronic/CCTV traffic management have impacted on death reductions. Car safety, in particular, can benefit; for example, the Volvo XC90 – has zero fatal collisions worldwide to date.

The DfT MORI report published May 2018 was a positive endorsement for the impact of speed awareness courses as a credible, cost effective educational alternative to punishment via penalty points and a fine. The report pointed to a significant reduction (29%) in offending in the immediate 6 months post attendance. DriveTech continues to work with UKROEd to build an evidence bank of qualitative and quantitative data from drivers who provide voluntary feedback to the tune of 3000 survey returns per month.

DriveTech has expertise and numerous programmes of training and risk reduction that addresses these issues and would be happy to explore a wider roll-out of these programmes to educate the road using population in a consistent, impactful and behaviour-changing manner.

It is important to note that not all road users present - or face - the same degree of risk. By targeting some activities and interventions using risk-based criteria, we increase the prospects of them being impactful and effective. A specific focus on helping higher risk driving populations (most notably younger and older drivers - 17-24 year olds, relatively new, inexperienced drivers and 70+ year old drivers) will help reduce these disproportionately represented groups in road casualty figures.

Question 3

What evidence led initiatives demonstrate what could be done to help reduce road traffic casualties? DfT analysis into the post-training impact of police-referred driver training interventions (speed awareness courses and similar, as an educational alternative to points and fines) indicates that delegates on-road behaviour changes for the better and has a lasting impact.

The basic instruments of a vehicle on British roads changed very little in the 50 years to 2010 but the last decade has witnessed a dramatic transformation. Drivers taking delivery of top of the range cars today are confronted by a very unfamiliar, yet highly technologically complex device. It is no exaggeration to say that their complexity exceeds those of even rudimentary aircraft or trains, yet pilots and locomotive drivers receive regular, regimented retraining and assessment.

As vehicles become ever more complex and their safety features more intrusive, and as the pace of change of those features increases inexorably, it is time to open the debate about licensing arrangements for drivers. Is it sufficient to allow a driver, to rely throughout their adult lives on a driving test they took, quite possibly, in their teens? Or is it more effective to instil a programme of lifelong driver training.

Driver training can be done digitally – making re-education an affordable, accessible and effective means of delivering behaviour change. Some form of re-education at the point of licence renewal (every 10 years) could well be the initiative that provides the answer.

Policing in general recognises that early intervention and education is vital to reducing criminality including poor driver behaviour. The distraction of other priorities and austerity does create a vacuum amongst police and partners - best illustrated by the loss of Neighbourhood Policing. Local authorities are also focused on community-based activity but most statutory partners are driven towards enforcement and competing priorities – the COVID pandemic has exacerbated this with expectations that Police will enforce breaches, local communities experience fly tipping and so on.

Drivetechnology is well placed and keen to engage on a collective - even national - level to provide some of the upstream education but drawing causation related evidence that is compelling enough to divert public funding is a challenge. There is evidence that speed awareness training reduces re-offending but if forces were to share casualty related data at a nominal and antecedent level the evidence base would be far more compelling or accurate.

Question 4

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

Not specifically as no access to this data.

Question 5

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

Not specifically as no access to this data.

Question 6

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

Mobile Road Traffic Enforcement including use of ANPR is highly effective when combined with strong intelligence - The Regional Roads Policing Unit is one example - now defunct, this team focused on organised crime groups (OCG's) operating in the Yorkshire region and were road network based.

Significant disruption of OCG's and seizures of drugs/firearms/contraband/stolen vehicles and goods was achieved. Local policing felt its impact and its loss as a result of austerity measures. This loss of pro-active capability had a further unintended outcome of accelerating the decline in neighbourhoods as OCG's were able to operate and gain footholds through the loss of a highly agile roads policing function.

Question 7

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

Education for all road users is key. It is well documented that apart from the "L" test learning experience, the vast majority of road users never get any exposure, mandatory or otherwise to further driver education, fundamental changes in road infrastructure, speed limits, vehicle technology, electric vehicles, signage or other aspects of the Highway Code.

A recently published survey of 2,000 motorists (conducted by Euro Car Parts) indicates that the vast majority would not object or challenge the opportunity to receive ongoing driver training interventions post licence-acquisition.

Enforcement has its place but lasting results are more likely to come about as a result of prevention and education. We believe the police have a role to play in this – not just for drivers being prosecuted but to proactively promote education before this eventuality.

Feedback from numerous clients attending speed awareness courses is overwhelmingly positive - in particular, the recognition that refresher training for all road users is a necessity and the only barrier is how this would be implemented.

A consideration is how to engage with communities and locally elected partnerships to create the same cultural stigma that now surrounds drink driving - there is something around galvanising wider partnerships to support this perhaps initially by using evidence and 'true stories' to create an acceptable narrative - building on this and creating legislative change potentially.

Question 8

How have improvements in design and technology of vehicles (such as collision avoidance systems) impacted upon road safety?

Undoubtedly, more sophisticated braking systems (e.g. ABS), and various detection/monitoring devices on modern vehicles provide greater assistance to drivers and will help to avoid some collisions. However, DriveTech believes that there is a risk of a significant drop in driver alertness and sense of exposure to risk corresponding to the publicity and 'disarming' messaging about new vehicle safety features. See DriveTech whitepapers on Autonomous Vehicles and on ADAS (Automatic Driver Assistance Systems).

Links to DriveTech whitepaper downloads here: <https://www.drivetech.co.uk/global-business-fleet-solutions/downloads/>

We would recommend more research should be commissioned to understand if there is a detrimental shift in driver attitudes to safety, with the belief that the vehicle will prevent most accidents and that drivers therefore need pay less attention to driver skills and driver alertness on road.

Furthermore, the road casualty statistics indicate no evidence to date, that improvements in vehicle technology are having a material impact on road safety. One challenge drivers now face is knowing

how to use all the technology in their vehicles. Manufacturers, dealerships and leasing companies offer very little in the way of vehicle handover or training. This is important for safety.

Question 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?

Positive initiatives and programmes such as FORS (Fleet Operator Recognition Scheme) are excellent ways to uphold good vehicle and driver safety standards and more commercial vehicle operators should be encouraged to adopt/embrace such standards.

Question 10

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

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Question 11

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

DriveTech understand that blanket speed reduction policies to reduce urban speeds from, for example, a default 30mph to 20mph zones/areas will have a claimed benefit in reduced pollution, as well as allowing the traffic to move more smoothly, and in greater harmony with other more vulnerable road users (typically motorcyclists, cyclists and other personal mobility devices). This might need greater and longer-term environmental analysis to prove this empirically, but DriveTech support the approach.

Similarly, on the strategic road network, the increasing conversion to 'smart' motorways (here with emphasis on the variable speed limits and dynamic traffic flow monitoring) has helped to iron out traffic flow and achieve smoother and generally safer movement – with gantry mounted speed cameras or average speed check sections helping compliance considerably. With corrections to the spacing of Emergency Refuge Areas (reduced distance between them), the approach to smart motorways should support roads policing and safety compliance.

Question 12

Is there evidence to show how prosecutions contribute to road safety?

There is evidence that prosecution including disqualification does not contribute to road safety as the re-offending rates are often high. The offender profiling often shows a cultural ignorance, poor education, access to vehicles (so not economically poor), and links to wider crime. Disregard for personal and public safety and an acceptance that driving vehicles poorly is not on the same level as other crimes. In the absence of changing mindsets the behaviour cycles or spirals.

Question 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?

DriveTech continue to support the selective and proportionate use of speed detection cameras and would encourage more placements (and increased use of average speed check road sections) to control and discourage speeding. Again, a recent AA Populus survey of UK motorists indicate the majority recognise the role of speed cameras and are also supportive of their use.

We have already seen how technology and innovation can make a significant contribution - not least to mitigating problems of resourcing: our own example of delivering speed awareness following camera enforcement is an excellent example of how this drives safety outcomes and prevents the worst consequences of, for example, reductions in roads policing capacity. We need to continue to innovate and exploit new technologies as they come on-stream.

Question 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?

We refer to our answers above (notably to Q13).

Effective e-learning interventions made available (“pushed”) to minor offenders/cautioned drivers – can be easily auto triggered in partnership with a professional training provider (DriveTech deliver such to both the public and also to fleet drivers so have experience and expertise in this area).

ENDS
