

RESPONSE DATED 10TH SEPTEMBER 2020 TO 'ROADS POLICING: NOT OPTIONAL - AN INSPECTION OF ROADS POLICING IN ENGLAND AND WALES' PUBLISHED BY HMICFRS ON 15TH JULY 2020

Roads policing is undoubtedly an important aspect of policing and the number of people killed and seriously injured on our roads demonstrates this. Roads policing is also a common concern, highlighted to me, by the residents of Avon and Somerset.

The recommendations applicable to the Chief Constable are noted as:

- Recommendation 4 – With immediate effect, chief constables should make sure that roads policing is included in their force’s strategic threat and risk assessments, which should identify the areas of highest harm and risk and the appropriate responses.
- Recommendation 6 – With immediate effect, chief constables should make sure:
 - their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area;
 - that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and
 - there is evaluation of road safety initiatives to establish their effectiveness.
- Recommendation 8 – With immediate effect, chief constables should make sure that their force (or where applicable road safety partnerships of which their force is a member), comply with (the current version of) Department for Transport Circular 1/2007 in relation to the use of speed and red-light cameras.
- Recommendation 9 – With immediate effect, in forces where Operation Snap (the provision of digital video footage by the public) has been adopted, chief constables should make sure that it has enough resources and process to support its efficient and effective use.
- Recommendation 10 – With immediate effect, chief constables should satisfy themselves that the resources allocated to policing the strategic road network within their force areas are sufficient. As part of that process they should make sure that their force has effective partnership arrangements including appropriate intelligence sharing agreements with relevant highways agencies.
- Recommendation 11 – By 1 August 2021, the College of Policing should include a serious collision investigation module for completion along with the Professionalising Investigation Programme (PIP). This should include minimum national training standards; and certification for all serious collision investigators. Chief constables should make sure that all serious collision investigators in their force are then trained to those standards.
- Recommendation 12 – With immediate effect, chief constables should make sure that appropriate welfare support is provided to specialist investigators and family liaison officers involved in the investigation of fatal road traffic collisions.

In addition there were the following areas for improvement cited:

- Force-level support to national roads policing operations and intelligence structure is an area for improvement.
- The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.
- The awareness and understanding of the changes in the Professionalising Investigation Programme (PIP) within police forces is an area for improvement.

There were 13 recommendations – the others not for the Chief Constable to implement – however I would like to comment on recommendation three which relates directly to myself as PCC. The recommendation is that the Home Office should use their statutory power to issue guidance on what should be included within future police and crime plans. The guidance should require reference to roads policing in all police and crime plans.

Road safety does feature in my Police and Crime Plan for Avon and Somerset. Objective 2.3 of my plan is that “the police and partners are focussed on reducing harm and solving problems related to the crimes that matter most to local communities”. Road safety is one of four themes identified in my plan as mattering most to local communities. The plan also makes clear that I expect the Constabulary to work together with local authorities, the Highways Agency and citizens to make our roads safe and secure.

On the broader point of the Home Office mandating roads policing in all Police and Crime Plans I am not supportive of this. I can say this in the knowledge that I am not seeking re-election next year and so would not apply to me directly. However I feel if this were to be implemented roads policing would be the start and other items would soon follow. The fundamental point of Police and Crime Plans is that they are supposed to be specific to the force area. PCCs write their plans cognisant of the policing priorities in their area, their vision and the available resource to be able to deliver both of these factors. My concern would be that this, or any future, government start making the contents of Police and Crime Plans too prescriptive. This could lead to plans becoming homogenised meaning they do not truly reflect local issues and a situation where everything is deemed as a priority.

My responses to the recommendations and areas for improvement, for the Chief Constable, are below. On a broader point it is also worth mentioning the Forensic Collision Investigation Network (FCIN) being launched by the National Police Chiefs’ Council (NPCC). The network has been created to enable the police service to react in the most efficient, effective and professionalised way in and around collision scenes. It will ensure investigators are recognised as the experts in their field and is looking to achieve full accreditation (to international, ISO, standards). The pilot force is due to be subject to the accreditation process before the end of 2020 and then Avon and Somerset Constabulary is in the first full group of forces due to go through the process from April 2021. The Constabulary has been planning for these changes and has already been providing training and equipment that will meet the vigorous standards. It recognises where there are some gaps in current practices and will, of course, seek to implement and learning from the pilot force.

Recommendation 4

The Constabulary have started the comprehensive work needed to create a roads policing strategic threat and risk assessment (STRA); this has included visiting other forces to establish best practice. The Constabulary aim to have the first version of this completed within the next year.

Recommendation 6

The Constabulary Road Safety team have been working to develop and grow the forces analytical capability. However the filling of analytical support roles for road safety is a challenge. Roles are filled on a needs basis and roads policing scores low on the threat, harm, risk measure used and so higher priority areas of business will be supported first. This is just one example of needing to appropriately match resources to demand where there are not enough resources.

The Constabulary Road Safety team have re-engaged with local authorities over the last couple of years and as a result has seen improved relationships and shared working. However, it is acknowledged there is still work to do to fully align operations where there are shared objectives such as road safety. The Constabulary team sit on the regional West of England Road Safety Partnership (WoERSP) and are currently reviewing the effectiveness and future direction of the Partnership.

During its fixed funding period the Office for Data Analytics (ODA) programme had started to develop a multi-agency data sharing portal bringing together road related data from the police, Local Authorities, Highways England and Fire and Health Services. When the funding finished the work was taken back in-house by the Constabulary. Again due to resource limitations this work was not able to progress as it would have, had the ODA funding continued. However the Road Safety team has started to engage with the WoERSP Data Group to find a way forward in terms of data sharing and use. This also addresses the second area for improvement.

Recommendation 8

The Constabulary is compliant with the current version of Department for Transport Circular 1/2007 in relation to the use of speed cameras and red-light cameras.

The four points that attention was drawn to within the DFT circular are below with commentary on the Constabulary position:

- *Speed camera housings, the camera operator or the mobile enforcement vehicle should be clearly visible to the driver from 100m at speed limits above 40mph.* All enforcement Officers carryout a risk assessment when setting up a site which includes ensuring that the vehicles and the Officers are visible and meet this requirement. All static cameras also comply with this requirement and are listed on the Constabulary website.
- *Fixed speed camera housings located within an area of street or highway lighting should be coloured yellow.* All Fixed Speed camera housings within Avon and Somerset are coloured yellow, irrelevant of whether there is street or highway lighting.
- *Vehicles from which enforcement may take place should be liveried and clearly identifiable as an enforcement vehicle.* All enforcement vehicles (bikes and vans) are liveried.

- *Enforcement officers should be conspicuous by wearing high-visibility clothing.* Enforcement Officers who operate from bikes or outside of the vans wear high visibility jackets.

Recommendation 9

Since 2017 members of the public have been able to submit dashcam (or similar) footage through the Constabulary's website; this has now been integrated with the online reporting of an incident on the roads. This footage is managed and processed by the Road Safety Support Unit (RSSU) within the Constabulary's Criminal Justice Department. The RSSU is the same team that process and deal with other traffic offences such as speeding; it is therefore a large team with the ability to flexibly use resource to meet the varied demand requirements. Over the past year the Constabulary have been working with the public to improve the response to those who do submit the footage. The Constabulary is also a member of the national dashcam user group that is developing national guidance to bring a consistent approach across the country. Once this guidance has been published it will be adopted by the Constabulary.

Recommendation 10

Avon and Somerset Constabulary (ASC) currently parade a minimum of one Sergeant and six Police Constables at any one time in order to service demand on the strategic road network. This is supported by a Lead Investigator and a team of Collision Investigators able to respond and manage a minimum of two simultaneous fatal or serious road traffic incidents. This number helps ensure that the Constabulary are able to respond and deal with all matters requiring a police attendance and to support Highways England who will also provide a response where appropriate. The Constabulary work closely with Highways including the sharing of forward facing analytical intelligence scanning to identify and plan for expected demand.

Resource numbers, locations and directed patrols are determined by looking at demand of previous years to determine a minimum number required to service this demand effectively and efficiently. Last year roads policing return to Constabulary control from a regional collaboration; as part of the programme of work to bring this back 'in-house' there was detailed demand analysis done. Although current information would suggest the resource numbers are correct, further analysis of regional and national data should help shape the resource numbers and working practices which includes partnership working. This will form part of the STRA discussed above. Roads policing will also be considered as part of the force's Futures Programme which is managing the recruitment, training and deployment of additional police officers funded through Operation Uplift. This work will consider demand and resource requirements across all force functions including roads policing units.

It is worth noting that the response the coronavirus pandemic caused a change in demand. There was a significant reduction in traffic and road congestion which in turn meant a reduction in the number of road traffic collisions and those killed and seriously injured. It is likely that lockdown changed the way individuals use the roads, presenting an increased risk to vulnerable road users. The emptiness of roads, good weather and requirement for exercise have led to the likely increase in cyclists and motorcyclists. Lockdown has not reduced the risk posed by dangerous drivers. Despite the closure of pubs/bars, individuals continue to drink/consume drugs elsewhere before driving to supermarkets or open spaces.

There is an increased risk posed by speeding vehicles. Speeding offence and traffic data highlight an increase in the percentage of vehicles speeding relative to the total number of vehicles using the roads, with a noticeable increase in top end speeds. The presence of speed enforcement units and the roads policing team provided the public with reassurance and acted as a deterrent in locations where speeding concerns have been raised. There has also been increased concern from the community recently about 'car meets/cruises' in certain parts of the force. The response to these can also involve the use of the specialist roads policing teams.

Recommendation 11

Avon and Somerset have adopted Authorised Professional Practice on road policing, investigating road deaths, as supplied by the College of Policing. They have a team of one police staff supervisor and four investigators and they investigate all serious collisions. Once the College introduce the new module, the Constabulary will adopt this into their training. The Constabulary have not currently made the PIP2 qualification mandatory for being a Collision Investigator. This was decided because it would require the investigators to go on attachments to other parts of the organisation to gain this qualification meaning the loss of those skilled staff from roads policing and therefore a reduced service to the public. Although it is worth noting that most of the team were formerly detectives so bring this experience and expertise with them.

Recommendation 12

As a matter of course all Avon and Somerset road policing officers and family liaison officers that would deal with fatal road collisions are all part of the occupation health programme which includes a Trauma Risk Management Programme and professional counselling where required. This is a tried and tested pathway to support for all officers, which is easily accessible and with great results.

Area for improvement 1

When the Constabulary's current Road Safety Strategy was written it took into account the NPCC objectives and the national campaign calendar with a view that territorial policing should be supporting this national work. The support for the national intelligence structure will be limited because of the challenges mentioned in response to recommendation 6 (above).

It is also worth noting that recommendation 5 of the report was for the NPCC to review the role and structure of national roads policing operations and intelligence; once this has been done the Constabulary will follow the direction set by the NPCC.

Area for improvement 3

Avon and Somerset have been one of the forces involved, at a national level, in developing and updating the PIP. As a result of the changes the Constabulary redesigned their delivery of PIP levels 1 and 2. This new, refined, PIP delivery is embedded in the training of new officers through the Police Constable Degree Apprenticeship (which includes a module on roads policing). The refined PIP standards will also be used to train a new cohort of Police Staff Investigators.

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