



IAM response:

**A Safer Way: Consultation on Making
Britain's Roads the Safest in the World**

Introduction

The IAM (Institute of Advanced Motorists) directly influences the driving and riding of more than 160,000 road users a year (full members, associates and commercial clients) in the UK and Ireland.

Established in 1956, the IAM is today best known for the advanced driving test and the advanced driving course. The IAM has grown to become the UK's largest road safety charity, dedicated to raising driving standards, engaging with the road-using public and influencing road safety policy. The commercial division of the IAM operates through occupational driver training companies IAM Fleet UK, Drive & Survive and IAM Fleet Ireland.

In January 2007, the IAM Motoring Trust was established as the policy and research division (PRD). The PRD undertakes research projects, consultation responses and run campaigns, which assist in the understanding of road safety issues, inform the development of road safety policy, raise the IAM's profile in the media and increase the IAM's ability to lobby at a senior level. It also provides an expert comment function to raise the IAM's profile in the media and develop positive relationships with journalists.

The IAM warmly welcomes 'A Safer Way: Consultation on Making Britain's Roads the Safest in the World'. There is no doubt that strategic leadership and target setting from central government has been instrumental in focussing road safety activities and achieving substantial success in reducing the toll of death and serious injuries on our roads over the last ten years.

The IAM's responses to the consultation questions are laid out below. The IAM has no objection to our views being reproduced as the Department sees fit. All IAM reports referred to in this response are available at iam.org.uk.

IAM responses

1. Do you agree that our vision for road safety should be to have the safest roads in the world?

The IAM has long sought a strong and simple vision from government to galvanise expert and public support alike behind road safety. Whilst a vision that includes some element of road user responsibility would be more comprehensive the IAM believes that the chosen statement clearly does cover all aspects of road safety (driver/rider, road and vehicle) and it has our full support.

Achieving world leadership will be a challenge as the IAM Motoring Facts noted recently we are currently sixth in the table per head of population. Reaching the number one spot will be a valuable achievement but maintaining that position will be an ongoing challenge. As world leaders we must actively engage across the world in disseminating good practice.

A vision without strong leadership is however unlikely to succeed and the IAM would like to see much more senior government support for road safety. In France deaths and serious injuries reduced substantially after the French President made it a top national and personal priority. As the main killer of young people in the UK today and a major drain on the nation's resources in a time of recession this strategy should be clearly and publically backed at the highest level. The Prime Minister and the cabinet should be involved in its launch and subsequent monitoring and implementation.

2. Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?

The IAM supports the concept of long term targets to allow new technology to be developed and introduced.

- 3. Do you agree that our targets should be to reduce:**
- **Road deaths by at least 33 per cent by 2020 compared to the baseline of 2004-08 average number of deaths**
 - **The annual total of serious injuries on our roads by 2020 by at least 33 per cent**
 - **The annual total of road deaths and serious injuries to children and young people (aged 0-17) by at least 50 per cent against a baseline of the 2004-2008 average by 2020**
 - **By at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compared with the 2004-08 average**

The IAM strongly welcomes the introduction of a new target for deaths on our roads. Whilst serious injuries can encompass a wide range of lasting impacts it is fatalities which bring the most grief and suffering to the largest number of individual families, friends and society as a whole.

The choice of the age range 0-17 in the target for children is welcomed. As the recent IAM report '16 - the dangerous age for moped riders' and our 'Parents Guide for Child Safety' both conclude risk is highest at transition points in a child's development. These may be primary to senior school, school to college, walking to cycling or cycling to motorised modes. Including the first forays into motorised transport will encourage practitioners to focus on this previously often ignored problem.

- 4. We are proposing a set of indicators in order to help us monitor performance. Do you believe these cover the right areas?**

The list appears comprehensive and covers the key priority areas. It does however; lack an element of measurement of behavioural change. This could include information such as numbers convicted of careless and dangerous driving as a possible indicator although inconsistent delivery of police enforcement may make this hard to track.

The IAM notes that household surveys and other surveys such as the British Crime Survey do have an influence on other aspects of government policy and we believe there may be a role for road user opinion surveys to chart progress. The government has promised a fair deal for road users and to treat them more like customers in the future. Measuring customer satisfaction should therefore be a key research area with a view to integrating results into the long term strategy. For example many surveys show that driver's believe that motorways are the most dangerous roads. If we are ever to convince them otherwise and to start treating rural single carriageways with respect we should be monitoring the success of new campaigns and programmes in changing opinion and behaviour.

Indicator 12 may not be useful on rural roads where, by the governments own admission, excessive speeds can often not be achieved and most incidents occur below the limit. A more in depth analysis of actual speed and common crash types may be more useful.

Crash statistics involving those driving in the course of business should be included in the list.

5. We have identified a number of factors that may affect our ability to deliver road safety improvement in the future world we are planning for. Do you think we have taken account of the key risks and opportunities?

The list appears comprehensive. The risk and opportunities of changing international migration patterns for work in the future should be considered.

6. We think the key challenge for road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree?

The IAM accepts that delivery is a key challenge but this has often in the past been due to lack of resources rather than lack of ideas or commitment. Transport spending may be squeezed in the next few years as the recession continues and until the economy picks up again. It is essential that central and local government maintain real terms spending on transport and safety. Any authorities not doing so should be named and shamed by the new delivery board in its annual reports. The recent IAM Motoring Facts report highlighted the discrepancies in spending per mile of road and casualty rates in different parts of Britain. Risk of death and serious injury should be the same no matter where you live and the commitment towards evening out these risk variations is an important step forward.

The IAM accept that ring fencing of taxation from road users for transport and road safety investment is unlikely but this remains our ultimate policy goal. In the meantime dedicated government programmes for mass action engineering measures and more use of specific competitive funds for road safety initiatives will encourage authorities to apply and ensure delivery in the right areas.

7. This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our analysis? Would you highlight any others?

The analysis by the department is perceptive and very useful to practitioners. The IAM would note that there must continue to be a strong priority given to data quality. 'Stats 19' is the cornerstone of road safety policy but in reality is often open to criticism for accuracy due to conflicting priorities for the emergency services at the scene of an incident. Without accurate data we cannot apply the correct remedial measures and this must be an ongoing target for research, training and improvement.

In adopting its new vision the UK must be closely involved in improving the collection and standardisation of international road safety statistics otherwise achieving the safest roads in the world may be open to question.

As the casualty figures fall we should seek to find ways of squeezing them further without making major alterations to the way the vast majority of careful and responsible road users are expected to behave just because of the behaviour of an increasingly small minority.

8. We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done?

The IAM welcome the concept of learning more from real collisions. An expert board tasked with spotting trends, locations, common themes and indentifying solutions would make a real impact on road safety. Recent IAM sponsored research on collisions with crash barriers involving motorcyclists shows that there is much still to learn from the way safety systems work in the real world.

The IAM support the 'Timebank' philosophy of sharing information but it must be open to all bodies with an interest in road safety including the private and charitable sectors.

9. Do you agree that an independent annual report on road safety performance, created on an annual basis, would be a worthwhile innovation?

This suggestion appears to have considerable merit but must focus on the full range of road safety activities rather than just engineering and enforcement. The IAM are concerned that the consultation document as a whole does not appear to fix a stronger responsibility on the Home Office and police forces to undertake consistent enforcement. The annual report should include comments on police force performance if required. Where recommendations require cross government implementation the board should have the ability to achieve this.

10. Do you agree that the Road Safety Delivery Board should be tasked with holding government and other stakeholders to account on the implementation of a new national road safety plan?

See our comment in reply to question 9. In our view any Board without high level support and real influence to change the way road safety is delivered would be a missed opportunity.

11. Do you agree that highway authorities reviewing and, where appropriate reducing speed limits on single carriageway roads will be an effective way of addressing the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved?

Prioritising speed reviews on the worst roads is welcomed. Sharing best practice in this area would also be a step forward. We would oppose, however, a blanket reduction in the speed limit, and are concerned that some authorities may choose to reduce limits as a “default position” without proper cause – thus missing the opportunity to deal with real collision causation where speed is not the issue.

The IAM is concerned that the key role of driver behaviour in rural road crashes continues to be overlooked and little new or innovative thinking is clear from this consultation document. Including rural roads in the driving test, encouraging drivers and riders to seek advanced training to help them cope with rural roads and research into attitude and real world crashes is urgently needed.

12. How can we most effectively promote the implementation of 20mph zone schemes in residential areas? What other measures should we be encouraging to reduce pedestrian and cyclist casualties in towns?

The IAM does not support the blanket imposition of 20mph limits on roads where competent drivers would easily cope with a 30mph limit. In general only roads carrying local traffic should carry a 20mph limit unless there is an overwhelming safety case for the lower limit. Where implemented 20mph limits should be self enforcing through design of road layouts and control of through routes.

IAM research on cycling motorist shows that many drivers could be persuaded to cycle more if their concerns were addressed. Some of these concerns such as the weather and time constraints will be hard to crack but others such as safety fears from other vehicles could be addressed by more segregated cycling facilities. Confidence in using a bicycle in modern road conditions can also be fostered by encouraging adult refresher training similar to that offered by the IAM.

13. How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes?

Whilst information, dissemination of best practice and monitoring of targets will help to focus local efforts it is ultimately the availability of sufficient funds which will determine which schemes get the go ahead.

Specific competitive funding for mass action schemes, training initiatives, campaigns and other forms of road safety work will deliver the improvement we all wish to see. Where budgets are cut central government should highlight the lack of funding and name and shame the worst authorities.

14. What should government do to secure the greater road safety benefits from vehicles?

The IAM support FIA campaigns to introduce ESC into a wider range of vehicles. Government taxation regimes must not work against road safety. For example taxation based on CO2 emissions can lead to some vehicles laden with safety features which add weight being penalised. Discounts on VED or tax breaks for purchasing safer cars would give a very strong message that the government is serious about new technology in cars.

Traction control and crash avoidance systems would actually deliver greatest benefit to those who can least afford them eg young drivers. The government should work with insurers, car suppliers and the motor trade to introduce innovative schemes to allow young drivers to obtain the latest cars with the features they need more than most.

Central government departments of all kinds plus local councils and other government agencies and bodies should all specify ESC and the latest technology in their car and van leasing, buying and renting policies to stimulate the market. This should also extend to insisting on training and advanced driving courses for those driving on public authority business.

15. Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduce casualties?

A fully controlled driving or riding task does not command the support of IAM members. As long as ordinary drivers have some form of over-ride they will continue to make errors. There are some real issues to be overcome at the point at which the car starts to control itself – who is to blame if something goes wrong, is a simple example. This is a long term technology that will take many years to reach critical mass and widespread public acceptance. The IAM believe that advanced driver training, revised new driver training and more high profile enforcement coupled to safer road designs will deliver similar benefits at much lower cost.

16. How can we best encourage consumers to include safety performance in their purchasing decisions?

In the field of transport incentives always work better – examples include the switch to unleaded petrol and the CO2 graduated VED scheme. New car tax, VED or VAT discounts for 5 star EuroNCAP cars could be delivered very quickly.

Becoming a safer driver should also be incentivised. This could include better co-ordination between advanced driving providers and the DSA to capture new drivers and inform them of the courses available to enhance their driving. Tax breaks for companies who provide courses for their staff should also be considered.

17. We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

The IAM's top priorities are all on this list with the exception of illegal mobile phone use which we believe should still be a priority for enforcement and education. We are particularly pleased to see the commitment to reducing illegal and irresponsible road use.

General driver error should not be lightly dismissed as an important factor in crashes. Human beings will always make mistakes but certain strategies such as high profile police presence on the roads can, in our view, deliver improvements in driver behaviour and attentiveness very quickly. More research is needed to define the exact levels of enforcement that work. Given the propensity of people to make mistakes reduction of driver error would be a useful area for partnership between advanced driving and riding practitioners, researchers and the government.

Those who have passed their advanced driving test make fewer errors and sustain the benefits of their training over time. This has been well researched by Brunel University. If driver error was on the list of the most important behaviours it would allow much quicker and wider dissemination of the benefits of our DSA quality assured courses.

However – no matter what is on the list of poor behaviours the thrust must be to prevent them, rather than to punish them after the event. Enforcement must therefore be visible, seen to be fair by those subject to it, and of an adequate level to be effective.

18. What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

Changing driver behaviour will be a long term task. The results from speed surveys and opinion research show that we are already beginning to get the message over. This approach should continue as it is important not to alienate the majority of relatively careful drivers. New speed camera equipment is often portrayed negatively in the media and safety camera partnerships and the government should be more open about the reduction in the income from safety cameras as the programme matures. Many drivers do not accept intuitively that speeding is the sole cause of crashes and this must be accepted by the government in its campaign planning. The role of human error must always be stressed. There is a risk that average speed cameras will not be accepted if a clear link to risk and injury crashes is not made from the beginning.

IAM members are often concerned that speeding offences are enforced to the letter whilst the poor, careless or dangerous driving they see elsewhere on the network goes unpunished. Again the role of high profile police enforcement on the roads is the key here. In the view of the IAM the emphasis must shift to consistent high profile enforcement of existing laws rather than new or more draconian punishments. There is little positive evidence that harsher punishments work – penalty points for mobile phone use has little effect if drivers don't think they will be caught, long sentences for dangerous driving are needed but do little to affect the behaviour of the determinedly uncaring or the momentarily careless. Standard criminology tells us that the fear of being caught is the deterrent, not the severity of the punishment. Enforcement must be present in a manner that drivers respect – and which achieves deterrence of all the kinds of poor behaviour identified. Without a clear joined up cross-government priority for enforcement we risk losing the support of the majority of drivers for road safety measures in general.

19. What more can be done to encourage safe and responsible driving?

As the IAM has already stated a much fairer and consistent system of high profile police enforcement of current traffic laws will in our view do much to encourage safe and responsible driving.

The IAM also believes that attitudes are the key to safe driving and they must be set from an early age. Road safety education for children is important but the role of parents and other drivers and riders must not be underestimated. Most young drivers stick to the limits when learning to drive but quickly adopt the bad habits of the majority when they have passed their test. Combined with their lack of experience this can be a fatal combination. The safest drivers recognise their responsibilities to others rather than acting solely as individuals on the road.

20. Should more be done to reward good driving? If so what?

The IAM would be interested to see the idea of 'positive points' being researched to measure its potential impact. Under this approach drivers start with 12 points and then lose them. Passing an advanced test or completing several years of unblemished driving or riding could be rewarded with extra points. Whilst these extra points could most easily be linked to insurance discounts the scope for this in a competitive insurance market is limited. The government does however have some degree of control over Insurance Premium Tax (IPT) which could be linked to good driver behaviour in some way. For example the best drivers could pay little or no IPT.

Safe driving days or 'driver of the year' competitions may have some scope to influence those who already take a measure of pride in their driving. At a national level the scope for manufacturer tie ins and substantial prizes would be that much wider.

Ultimately the best way to reward good driving is to ensure that illegal or irresponsible driving never goes unpunished. Government must also do more to be positive – as well as punishing those who perform badly, there is a need to encourage those who seek to maintain their performance at a good level. Tax breaks for companies having their drivers trained are an obvious example. Similarly private drivers (including riders) should be actively encouraged to develop or at least maintain their driving quality, rather than the current environment in which no such encouragement is apparent for the vast majority. A culture in which road users feel they should behave appropriately needs to be developed – the concept of making speeding as anti-social as drink-driving is an example. However, culture change needs leadership, and the higher positioned the leader, the more likely it is to succeed. Ministers – from more than just the DfT – must take a lead here, and be seen to be active themselves, supporting initiatives, seeking ways of benefitting individuals and companies, and helping culture develop positively.

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