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Rt Hon Priti Patel MP
Home Secretary
2 Marsham Street
London
SW1P 4DF

9th September 2020

Dear *Priti*

Response to HMICFRS report – “Road Policing: Not Optional An inspection of roads policing in England and Wales”

Under Section 55(5) of the Police Act 1996, as Acting Police and Crime Commissioner I am pleased to provide my formal response to HMICFRS’s report entitled “**Road Policing: Not Optional An inspection of roads policing in England and Wales**”.

Both the Chief Constable and I welcome the publication of HMICFRS’ report looking at Roads Policing. I believe roads safety is an important issue and as such it is included in the priorities for action in my Police and Crime Plan 2017-20. In addition, both the OPCC and the Constabulary are members of the Cambridgeshire and Peterborough Vision Zero Partnership, and helped develop its strategy to deliver safer roads for Cambridgeshire and Peterborough. The Partnership is collectively working towards a long-term strategic goal of Vision Zero, utilising the internationally recognised Safe System approach to reduce the number of deaths and serious injuries on the roads to Zero. The Safe System approach places road safety in the centre of road traffic system planning, design, operation and use, delivered by five workstreams: Safe People; Safe Vehicles; Safe Speeds; Safe Roads and Roadsides; and Post Collision Response. The Constabulary is the lead agency for Safe Speeds with responsibility for coordinating speed management activities, including targeted speed enforcement and encouraging compliance with speed limits to prevent road users from being killed or seriously injured on the Partnership’s roads.

I was pleased to see the Constabulary move quickly to understand the implications of the report and begin coordinated work to address the recommendations and

areas for improvement I will take further reassurance from the Chief Constable via my Board meeting in due course once the recommendations are in place given that it is for police forces themselves to implement the changes.

The HMICFRS recommendations and constabulary response are attached in Appendix 1

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ray Bisby', with a large, stylized initial 'R'.

Ray Bisby

Acting Police and Crime Commissioner for Cambridgeshire and Peterborough

cc PCC@hmic.gsi.gov.uk

Appendix 1

HMICFRS recommendations and constabulary response

- 1.1 **Recommendation 1: By 1 August 2021, the Department for Transport and the Home Office should develop and publish a national road safety strategy that provides clear guidance to the police, local authorities, highways agencies and other strategic partners. The strategy should include an explanation of the roles and responsibilities of each agency and the expectations of central government.**

Response: This recommendation is addressed to the Department for Transport and the Home Office. Bedfordshire, Cambridgeshire & Hertfordshire (BCH) forces will await further guidance on the national road safety strategy.

- 1.2 **Recommendation 2: By 1 August 2021, the Home Office should revise the Strategic Policing Requirement to include an explicit reference to roads policing. Any revision should also include guidance on which bodies the requirement to collaborate with extends to.**

Response: This recommendation is addressed to the Home Office. The BCH forces will await further information on any revisions to the Strategic Policing Requirement.

- 1.3 **Recommendation 3: By 1 April 2021, the Home Office should use the statutory power under section 7(4) of the Police Reform and Social Responsibility Act 2011 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.**

Response: This recommendation is addressed to the Home Office. The BCH forces will await further information on the requirements for future police and crime plans.

Road safety is included in the priorities for action in the Acting Commissioner's Police and Crime Plan 2017-20. The Constabulary is part of a new multi-agency Vision Zero Partnership Strategy starting in 2020 to deliver safer roads for Cambridgeshire and Peterborough. The Partnership is collectively working towards a long-term strategic goal of Vision Zero, where there are no deaths and serious injuries on the roads using a best practice Safe System approach. The Safe System approach places road safety in the centre of road traffic system planning, design, operation and use, delivered by five workstreams: Safe People; Safe Vehicles; Safe Speeds; Safe Roads and Roadsides; and Post Collision Response. The Constabulary is the lead agency for Safe Speeds with responsibility for coordinating speed management activities, including targeted speed enforcement and encouraging compliance with speed limits to prevent road users from being killed or seriously injured on the Partnership's roads.

- 1.4 **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.**

Response: BCH are part of a well-established tri-force collaboration with a number of departments that provide a range of operational and specialist capabilities, including a shared Road Policing Unit (RPU) and Cameras, Tickets and Collisions (CTC) unit. RPU provides roads policing patrol, support and investigation across the three counties with proactive intervention to support casualty reduction measures, anti-social behaviour and ANPR teams to disrupt criminal usage of the road network. CTC are responsible for the administration of speed management of the roads, through fixed and mobile speed cameras, processing tickets for endorsable and non-endorsable offences and the administration of traffic offence reports.

An assessment of BCH RPU and CTC capacity and capability to meet current and predicted future demand was included in the 2019 Force Management Statements (FMS) for all three forces. Both RPU and CTC were identified as moderate to substantial strategic demand risks. The RPU and CTC will be further reviewed as part of preparation for FMS 2020. RPU will also be included in a recently introduced Joint Protective Services Annual Service Priority Assessment Review (JASPAR) process, that will assess demand (current and future); resources (workforce and other assets); and cost (actual and predicted) to inform future decision making and planning. This will be considered alongside local assets that contribute to policing the road network.

- 1.5 **Recommendation 5: By 1 April 2021, the National Police Chiefs' Council should review the role and structure of national roads policing operations and intelligence.**

Response: This recommendation is addressed to the National Police Chiefs' Council. The BCH forces will await further information on the role and structure of national roads policing operations and intelligence.

- 1.6 **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.**

Response: The CTC unit, and the three Road Safety Partnerships, provide analytical support to identify risks and threats on the road network across the force areas. The BCH forces will review the current analytical capability to ensure that it is providing sufficient support to inform the appropriate deployment of resources; evaluate the effectiveness of activity to improve road safety; and share information across the partnership.

- 1.7 **Recommendation 7: By 1 August 2021, the Department for Transport, in consultation with the Home Office and the Welsh government should review and refresh Department for Transport Circular 1/2007. The Circular should include a requirement that forces, or local road safety partnerships should publish the annual revenue received as a result of the provision of driver offending-related training and how that revenue has been spent.**

Response: This recommendation is addressed to the Department for Transport. The BCH forces will await further information on the review of the Transport Circular 1/2007.

- 1.8 **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.**

Response: BCH are compliant with the Department for Transport Circular 1/2007. The guidance forms the basis on how all speed and red-light camera assets are deployed by the CTC unit and used across the three force areas. This will be subject to review to ensure ongoing compliance.

- 1.9 **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.**

Response: BCH have not adopted Operation Snap. However, have implemented an equivalent Digital Evidence Team within the CTC unit. The Digital Evidence Team is responsible for viewing and investigating Dashcam footage that has been submitted online by members of the public when reporting traffic offences. All three external force websites have a Vehicle Related Reporting facility with guidance on how submitted video footage will be used. The Team has been operational since December 2018 and has been subject to a Post-Implementation Review to evaluate service delivery. BCH will continue to review resources and processes to ensure efficient and effective outcomes.

- 1.10 **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.**

Response: An assessment of the BCH RPU and CTC unit capacity and capability to meet current and predicted future demand was included in the 2019 Force Management Statements (FMS) for all three forces. Both RPU and CTC were identified as moderate to substantial strategic demand risks. Although there are currently sufficient resources to provide an effective and efficient response to the strategic road network, increasing vacancies, low deployable strength and increasing demand will reduce capability to meet future demand. The RPU and CTC will be further reviewed as part of preparation for FMS 2020. RPU will also be included in a recently introduced Joint Protective Services Annual Service Priority Assessment Review (JASPAR) process, that will assess demand (current and future); resources (workforce and other assets); and cost (actual and predicted) to inform future decision making and planning. This will be considered alongside local assets that contribute to policing the road network.

- 1.11 **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. 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.**

Response: This recommendation is addressed to the College of Policing in the first instance. The BCH forces will await further information on the inclusion of a serious collision investigation module.

- 1.12 **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.**

Response: BCH are committed to providing appropriate health and wellbeing support to all investigators and family liaison officers (FLOs) involved in the investigation of fatal road traffic collisions. The RPU is now recognised as a priority by the BCH Occupational Health Unit (OHU). A yearly welfare assessment is carried out on each officer and should this flag any concerns, officers are offered a face-to-face meeting with one of the Psychological Health Advisors aligned to the department. RPU will also be covered by a new Peer Support Network due to be introduced in Autumn 2020. FLOs conduct annual OHU questionnaires as well as pre-deployment screening when assigned to incidents to assess fitness for role. FLOs have access to wellbeing services via the NHS psychological therapies service (IAPT), as well as the Employee Assistance Programme which offers short-term counselling, and TRiM which is a trauma focused process providing management, peer and Occupational Health welfare support where appropriate. BCH will review its wellbeing strategies to ensure that officers and staff are aware of and able to access these services.

- 1.13 **Recommendation 13: By 1 April 2021, the College of Policing and the National Police Chiefs' Council should establish role profiles for defined functions within roads policing and identify the required skills and capabilities.**

Response: This recommendation is addressed to the College of Policing and the National Police Chiefs' Council. The forces will await further information on role profiles for defined functions within roads policing.

2. **Proposed response to HMICFRS areas for improvement:**

- 2.1 AFI1: Force-level support to national roads policing operations and intelligence structure is an area for improvement.**

Response: BCH participate in Tier 1 NPCC national roads policing campaigns. The CTC unit Casualty Reduction Analyst shares briefing products with the RPU and local policing commands; collates data to support the evaluation of initiatives; and liaises with colleagues nationally to share and identify best practice. BCH will review internal tasking processes and communications across the forces to improve local activity in support of these campaigns.

2.2 AFI2: The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.

Response: BCH have long standing data sharing agreements with Highways England and Local Authorities. All Local Authorities receive weekly collision updates via the Collision Recording and Sharing database (CRASH). This will be extended to include Highways England in the near future.

2.3 AFI3: The awareness and understanding of the changes in the Professionalising Investigation Programme within police forces is an area for improvement.

Response: BCH have recognised the importance of investigator accreditation within the RPU Serious Collision Investigation Unit (SCIU). Officers within the SCIU are part of the detective pathway and are currently undertaking the National Investigators Exam (NIE) and completing Initial Crime Investigator Development Programme (ICIDP) modules to be accredited to PIP2 level. BCH will await further information on the inclusion of a serious collision investigation module to ensure staff are appropriately trained.