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The Chief Constable
Humberside Police,
Priory Police Station,
Priory Road,
Hull, Humberside HU5 5SF

cc Humberside MP's, Councillors of East Riding of Yorkshire, Hull City Council, North East Lincolnshire and North Lincolnshire Council, MEP's, the DfT, the Transport Select Committee, the Serious Fraud Office, Highways Agency, Humberside Fire and Rescue Service, and others.

This letter and all relevant documentation (and more on other road safety issues) is available on my web site at <http://www.fightbackwithfacts.com/humberside-safer-roads-false-claims/>

Safer Roads Humber:- Misconduct in a Public Office, Breaches of Statutory Duty of Care, of Perjury Act 1911 (false information in public documents), of Construction Design and Management Act 2007 (duty to identify and reduce hazards in use) and perhaps other criminal offences including false accounting and fraud.

Dear Chief Constable,

I file this formal complaint against Safer Roads Humber (<http://www.saferroadshumber.com/>) to bring to your attention that:

(a) SRH's recently published Report for 2010/11 (documents 5, 8, 9) claims benefits of their speed camera operations that are **utterly ludicrous, demonstrably wrong by very large margins** indeed and which (at least if SRH were a normal commercial company) would surely amount to **Fraudulent Misrepresentation or Serious Fraud**.

(b) Despite my repeated requests pointing out these serious discrepancies, **SRH flatly refuse to withdraw the Report**, claiming (wrongly as I now know) only to be following the DfT's instructions. In any case, following orders is no defence, their statutory responsibility necessarily includes correcting false statements brought to their attention.

(c) While it is obviously important that all public policy and spending decisions be based on the best available data and competent analysis, this is **acutely important in road safety because false or misleading information is likely to lead to more risk, accidents and casualties** than would otherwise occur. My complaint is therefore not just about arcane arithmetical or statistical arguments but about lives and limbs.

I must therefore ask that you:

1/ Review the evidence I provide to satisfy yourself that SRH's claims are indeed absurd and indefensible. Because it is (obviously) impossible to identify or record accidents that didn't happen, and because two of the three major components of the DfT's estimates of the value of accidents prevented are inevitably subjective and indeed notional (and as I demonstrate below, largely nonsense in any case) I am no more able to quantify accurately the supposed benefits of speed cameras than anyone else. What I can do however is to show beyond rational doubt is that SRH's claims are wildly exaggerated and far in excess of what could ever be achieved.

2/ As part of Safer Roads Humber, then use your authority to insist that these absurd claims are withdrawn and that the widest possible publicity is given to their withdrawal in an attempt to prevent other authorities being misled into making bad road safety decisions.

3/ As part of SRH, ensure that appropriate disciplinary action is taken against all individuals involved in the production and publication of these ludicrous claims.

4/ Because your Force is itself part of SRH, refer the evidence I provide to another Police Force that is not compromised by a similar relationship with speed camera organisations, with a view to criminal charges being filed under one or more of the headings at the top of this letter.

For your convenience (and also mine) rather than print all the associated documents I enclose a CD containing them all, including this letter. All are also available on my web site www.fightbackwithfacts.com

I need not repeat here the detailed analysis I provide in those documents but I summarise the discrepancies in SRH's analysis and claims as follows:

A/ Reductions supposedly achieved

How many accidents of what severity would have happened had cameras not been installed **has to be estimated as it cannot be measured** - this is of course the **biggest problem** in trying to establish camera effect, if any.

So how did SRH estimate them? Their Excel pages (document 09) show clearly (see the correspondence for details) that **they have assumed throughout that had cameras not been installed, accidents and casualties would have continued indefinitely at the same level as before camera installation!**

This, the fundamental flaw in their analysis, is of course utterly absurd!

Graphs (documents 26, 27 and many more at <http://www.fightbackwithfacts.com/casualty-data/>) show that casualties **fell very substantially across the country and in Humberside over the same period**, despite only 2% of roads being covered by cameras!

Equally, my own analysis of 4.7m injury accidents from **1989 to 2007** (document 29) shows clearly that across the country, accident numbers **at 1km square sites that would have qualified for cameras routinely fell without cameras** or any other measures. Line 34, emphasised shows how over this period, in 2,259 cases (far more than ever had cameras even in the later years) Humberside experienced falls in fatalities of **46% and KSI of 31%**. Over the total of 7 years on which SRH's claims are based these falls would of course have been substantially greater.

In other words, SRH are claiming credit for accident reductions which would, for the most part, have happened anyway.

The other factors which bring about such falls include:

i/ **Long term trend** (better vehicles, parts, tyres, systems such as ABS and stability controls, air bags, road improvements, medical skills and speed of response, falling reporting levels.

ii/ Most importantly **economic booms and busts** whose effects show up clearly on fatality rates across the developed world, never more so than in the current recession since 2007 which has played a major part in the unusually large falls since then. See www.alsaces.ca for more details of **this important contributory factor.**

iii/ **Regression to the mean** - the well-known statistical probability that any variable which has recently suffered an increase will soon experience a fall back to normal levels. (For more detail see correspondence.)

iv/ Some drivers diverting to avoid cameras, and taking their share of traffic volume and accidents with them. SRH's data shows a 5% fall in traffic which should have been adjusted for but was not.

To ignore all of these other contributing factors amounts either to extraordinary incompetence or deliberate intention to mislead. Neither is remotely acceptable.

B/ Costs and Values

As if the above were not bad enough, SRH then go on to claim total **benefit of £73m** to the State (documents 5, 8) from their camera activities, by multiplying the above fantasy accident reduction figures by equally ludicrous DfT "values" of accidents avoided. As set out elsewhere (document 26 and <http://www.fightbackwithfacts.com/bogus-dft-values/>) but also here in brief:

i/ Much the largest component of the DfT's (inevitably subjective) estimate of the "value" of an accident or casualty avoided is their **figure for pain and suffering**. But however real the pain and suffering, **it is not and never will be "cost" or cash in any known ledger**. As the Comptroller of the National Audit Office has confirmed, it is **quite wrong** for figures that have been estimated in this way as "values" then to be used as if they were **cash** in estimating profit or loss or cost/benefit ratios. yet **that is precisely the impression that SRH give in their Report**.

ii/ The second largest component of the DfT's "value" of casualties, "**lost output**" (not "lost wages" as SRH identify it) is even more divorced from the real world because **no output is in fact lost!** When someone dies in a road accident (or anywhere else for any reason for that matter) his contribution to national GDP "output" does of course end - but is (on average) **cancelled out by the ending of his share of consumption**, leaving GDP per head (which is what matters) unchanged. It is simply **not acceptable to show one on one side of the ledger without showing the other on the other side**, and any auditor of a real company would haul anyone responsible for such an error over the coals.

Of course when the casualty does not die but loses working time, whether temporarily or permanently, his share of demand or consumption remains, but **precisely because demand is unaffected others step forward to take over the work** - and wages - he has lost. It is a fundamental rule of macroeconomics that **output of an economy is determined by demand, not by availability of labour**. Hence the casualty's output **is not lost, but simply taken up by someone else**. Does the DfT really believe that any employer faced with loss of an employee simply shrugs his shoulders and accepts a permanent reduction in output? **Of course not - he finds someone else to do the work!**

For these reasons, the true **cost in cash terms to the State of a fatal accident is about £20,000 not the £1.6m** widely used. Serious and slight injury figures are lower in the same way making, SRH's £73m claim even more absurd than it already was.

Other Points

It is immediately obvious in any case, as I set out repeatedly in my complaints to SRH, that **cameras cannot conceivably achieve the accident reductions claimed because the falls claimed far exceed the low proportions of accidents that involve speeding even as a minor factor, let alone the primary causal factor**. No one who has the slightest understanding of statistics or accident causation would believe these accident reduction claims for one moment, even if cameras prevented all speeding. However as SRH's data confirms, these reductions are essentially very modest, **of the order of 2 or 3 mph in average speed**. Does anyone seriously believe that this would cut accidents by 50/ 60/ 70/ 80/ 90/ 100%? If so they need locking up, for their own protection and ours.

This Nonsense Has to Stop!

Road users cannot afford to see road safety policy influenced by nonsense such as this. Please put a stop to it and ensure that those responsible are at least censured and if not, prosecuted

Yours faithfully,

Idris Francis B.Sc.