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28 Aug 2012

The Chair of Humberside Police Authority
Pacific Exchange
40 High Street
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Complaint Against Humberside Police

Dear Sir,

This complaint relates to **blatantly false and very seriously misleading claims made in Safer Roads Humber's Annual Report for 2010/11**. My complaint to you against **Humberside Police** is that through their involvement in Safer Roads Humber they are **party to those false claims**, that despite my having drawn their attention to compelling evidence that the claims cannot possibly be correct, **Humberside Police continue to condone those false claims** and have **refused to take any action either to ensure that they are withdrawn or that the individuals responsible are called to account**.

All of the necessary detail is contained in the enclosed copy letters and other documents on the enclosed CD and also on my web site www.fightbackwithfacts.com so here I need only summarise these issues here.

1/ Basic Principles

It is clearly important that Reports published by public bodies are based on the best information and analysis available, clearly and honestly presented. This is particularly important in the present context, road safety, where policy and **spending decisions based on false information or skewed analysis are likely to lead to greater risk to road users** than would otherwise be the case (including for example deaths because the limited funds available have been spent on methods which are not remotely cost-effective instead of on better methods).

Politicians, analysts and public alike are therefore entitled to expect not only that information provided in such Reports is **accurate and truthful**, but also that when **serious discrepancies come to light that incorrect information is withdrawn correct information published**.

2/ Why the Claims are Clearly False.

a/ There were **very substantial falls** in accident and casualty numbers across the **whole of Britain**, and indeed across the whole of Humberside, over the relevant eight years (98% of those roads having no speed cameras) yet Safer Roads Humber claim relies on the absurd assumption that **all such reductions at their camera sites were due to the presence of their cameras and nothing else**. In other words, they have **chosen to ignore many contributory factors** routinely taken into account by studies, factors including long term trend, regression to the mean, changes in traffic volume, the state of the economy etc.

b/ Safer Roads Humber's claims for the percentage reductions in accidents and casualties far exceed the percentages of such accidents and casualties that **ever involve speeds above speed limits** (let alone the lower percentages primarily caused by speeding.) And even though their own data shows that they far from eliminate speeding in any case!

c/ Having conjured up the above fantasy figures, they **then multiply them by other fantasy figures**, the "costs" of accidents and casualties. These costs are also sheer fantasy because:

i/ The single biggest part of the total, for pain and suffering, is (inevitably) a subjective and notional sum - **the one thing it is not is cash or cash cost** - yet Safer Roads Humber include it in the "cost savings" they claim to have achieved as if it were cash. The National Audit Office, no less, has said that this should not be done.

ii/ The second biggest part of the total, "**lost wages**" or "**lost output**" **does not exist. Overall, no wages or output are lost** because when anyone killed or injured in a road accident (or anywhere else) cannot work, someone else takes over to ensure that the work is done, orders are fulfilled and in macro terms, **supply equals demand!**

d/ The Report claims to have **provided a benefit to the State of some £73m over eight years**, in comparison to unstated costs probably amounting to some £16m, a benefit/cost ratio of about 4 to 1. However, **adjusting the observed accident and casualty reductions only for trend, regression to the mean and other factors, and in terms of what could ever realistically be possible as speed camera benefit, it becomes clear that the benefits were highly unlikely to have exceeded costs.** If we then also remove the fake "lost output" or "lost wages" figures the comparison becomes even worse.

3/ My Efforts to Have the False Claims withdrawn.

Having spent many thousands of hours over the last twelve years studying and understanding road safety and casualty statistics and policies I realised the moment I **read Safer Roads Humber's claims of casualties prevented by their speed cameras and their related cash savings to the State that they could only be very wildly exaggerated, far beyond what could ever be possible.** As the correspondence on the enclosed CD shows, I repeatedly contacted Safer Roads Humber, and later Humberside Councils, pointing out that the claims could only be nonsense, amounting at best to incompetent analysis and wishful thinking, but almost without exception **their response has been to brush away my complaints and refuse to take action of any kind.** It is surely significant however that **not a single reply has sought to justify the claims or to identify any errors in my analysis** - in my view a tacit admission that they know I am right.

When it became clear that, even at senior levels in the lead Council, no one was prepared to correct these false claims I posted a detailed formal complaint (enclosed) against Safer Roads Humber, to Humberside Police on the basis that **publishing false information in a public Report must amount to an offence under the general heading of misconduct in a public office etc.** I also pointed out that because Humberside Police is itself involved in Safer Roads Humber they should **refer my complaint to an independent Force** for investigation.

4/ Humberside Police's Refusal to Act, and my Complaint Against Them.

My complaint against Humberside Police arises from the following, as confirmed by their replies (enclosed)

(a) **As part of Safer Roads Humber** they as public servants had a responsibility - quite apart from their normal police responsibilities - **not to be involved in publishing false, misleading and potentially dangerous information.**

(b) This responsibility necessarily **includes ensuring, when they became aware that the information was false, that it was withdrawn** (or if they did not have the authority within Safer Roads Humber to do so, at least to **disassociate their Force from the claims.** They have done neither.

(c) They **failed to refer my complaint to an independent Force** but instead, although my complaint was primarily against civilian public servants, referred it to their own **Professional Standards Department** whose remit surely covers the conduct of police officers not civilians.

(d) They **treated it as if it were a Complaint Against the Police** (which at that stage at least) it was not.

(d) Despite the evidence provided they **refused to take any action.**

(e) They told me that they did not consider that **publication of a Report** (apparently regardless of how inaccurate or misleading it might be) **could amount to Misconduct in a Public Office or Breach of Statutory duty of care**. That surely has to be nonsense - it cannot be the case that public servants can publish anything they like without redress, and it surely must be the case at least that **public servants are required to correct serious errors when they are brought to their attention**.

(f) **They tried to give the impression that the Perjury Act 1911** (which I had brought to their attention in my complaint) **related only to legal proceedings** but in fact it does explicitly **cover the publication of false information in public documents**.

(g) They told me that "Furthermore the **fact that you disagree with the content of the report does not mean that the content is false or untrue**" - conveniently ignoring the evidence I provided that **showed beyond rational dispute that the claims could not remotely be true**.

(h) They told me that "*Humber Police as a partner of Safer Roads Humber supports and endorses*" the response from East Lincolnshire Council refusing to Act. That statement, taken literally, does not of course mean that they endorse the claims themselves, only the refusal to withdraw them. But it confirms that Humber Police, **surely in clear and direct breach of their duty to the public and to road users in particular, are prepared to condone the continued publication of claims which they must know to be false, seriously misleading and dangerous to road users and road safety policy**.

(j) I subsequently **wrote to the Chief Constable** pointing out that whether or not the publication of the false information amounted to an offence, the fact remains that the **claims are blatantly false**, with all the relevant implications for road safety, but I received only an utterly **dismissive reply, consisting of no more than one or two paragraphs, stating that no action will be taken**. I do not have that letter to hand, though the Police will.

5/ In Conclusion.

It is simply unacceptable that Councillors and others who make policy and spending decisions, taxpayers and road users alike are still being very seriously and dangerously misled about the supposed benefits provided by Safer Roads Humber, benefits which on any rational basis fall far below costs, and far below what spending £2m a year in other ways could achieve.

Please help me stop this dangerous nonsense.

Yours faithfully,

Idris Francis

