Fight Back With Facts

Ph (44) 01730829416

Mobile (44) 07717222459
E_Mail idrisfrancis@fightbackwithfacts.com

Sunny Bank,
Church Lane,
West Meon,
Petersfield,
Hampshire GU32 1LD

17 March 15

Leon Daniels
Managing Director of Surface Transport,
Transport for London,
11th Floor, Zone R4
Palestra, 197 Blackfriars Road
London SE1 8NJ

and others.

False Claims of Speed Camera Benefit, Wasting Public Money on More Cameras.
and Misconduct in Public Office

Mr. Daniels,

Your reply dated 13th March but not received until the 18th will be a useful addition to the already damning file of evidence I am compiling for my formal complaint of misconduct in public office against you and your colleagues. In other words, this matter is by no means closed nor do I understand why you would think that repeating the nonsense that caused me to escalate my complaint to Sir Peter Hendy would this time lead to closure.

Nor do I understand why my complaint about you and your policies, explicitly addressed for Sir Peter's personal attention, has been answered by you rather than by him. Further, had Sir Peter asked you to reply on his behalf I would have expected you to say so. That you failed to do so implies that he did not, with the possible further implication that my letter was diverted to you before Sir Peter saw it. Indeed, a friend long involved in investigating similar misconduct expressed surprise that I was surprised, saying that in those circles it is standard practice for complaints against officials to be referred to those same officials rather than being dealt with properly at more senior levels. I AM therefore copying this letter to Sir Peter for his information and also to ask whether he had seen my complaint and whether he had authorised you to reply to it.

Turning now to the substance of my complaint – that you remain determined to spend tens of millions of pounds of public money on 600 more speed cameras, when your own data confirms well beyond rational doubt that the 1,000 plus previously installed have failed to reduce accidents to any identifiable extent.
It seems to me to be significant that not once have you or your colleagues sought to challenge my analysis of your data and prove me wrong – make my day – but have instead sought refuge in referring to ten to fifteen years of reports with which I am far more familiar than you are, and which were and remain so seriously flawed that just listing the juvenile – at best – errors takes six A4 pages as attached and enclosed.

Further, one of your junior colleagues replied to me some months ago assuring me that my claims would be assessed and that he would reply when they had been. One implication of his failure to do so is that he or others realised that I am right but did not dare admit it or was instructed not to do so.

The same applies to your six colleagues at senior level who last September attended a meeting within TfL at which similar evidence of (at best) no camera benefit was presented only, it seems, to ignore it as you are trying to do.

Before covering my analysis again, I make this point in particular – whatever claims of camera benefit might have been made ten to fifteen years ago in other areas, based on modest volumes of data, a large dose of wishful thinking and ignoring fundamental statistical principles that have been well understood for more than a century are utterly irrelevant to my current complaint which uses only simple arithmetic to **show that accidents fell no faster at TfL's camera sites than they did where there were no cameras.**

I refuse to believe that anyone in paid employment, let alone anyone paid £328,448 a year, could fail to understand the simple arithmetic involved or to agree that your cameras have no discernible effect on accident rates. If our two views are "irreconcilable" as you claim, that is only because I am right but you refuse to – or dare not – admit the truth. How strange it is that, even after the recent unprecedented period of senior officials in the social services, police forces and elsewhere having found to their cost that, as the old saying goes, "The original failure might have been a problem, but it's the cover-up that's fatal." you continue to prefer fantasy to fact ... despite the even older saying "Truth will out".

Dare I suggest that you actually look at the evidence of what happened at your sites? Or, if you are too busy writing self-congratulatory blogs or feel that you are too senior to be bothered with detail, to ask a junior accounts clerk or work-experience statistician to take an hour to do so?

Method of Analysis TfL's Excel Spreadsheet

1/ Sort the data on the TfL site reference column to ensure that duplicated rows are next to one another

2/ Delete all but one any group of rows showing the same site reference and accident data (due to more than one camera covering some sites)

3/ Delete average speed camera rows for lack of sufficient data to be meaningful.

Steps 2 and 3 reduce the numbers of rows from 1,000 or so to 750 or so.

4/ Store the resulting sheet for future reference

5/ Decide which parameter to analyse – Fatal, Serious or Slight accidents or injuries. (If combinations such as Fatal and Serious collisions are needed the separate data can easily be combined into new columns.

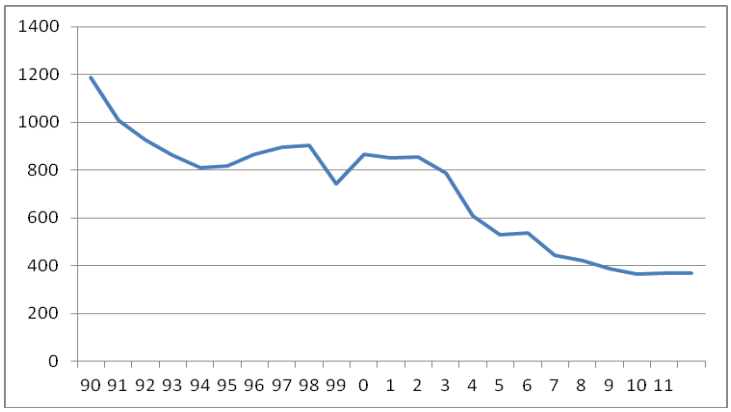
6/ Delete all columns except site reference, speed limit and camera type, the latter two needed to allow analysis by different combinations of them.

7/ Sort the remaining data by site monitoring start date

8/ Store as a new sheet named for the parameter being analysed.

9/ Sum the data columns for columns 1990-2012 (excluding sites commissioned in 1990 to 1993 (for lack of sufficient prior data to establish normality before selection for abnormality).

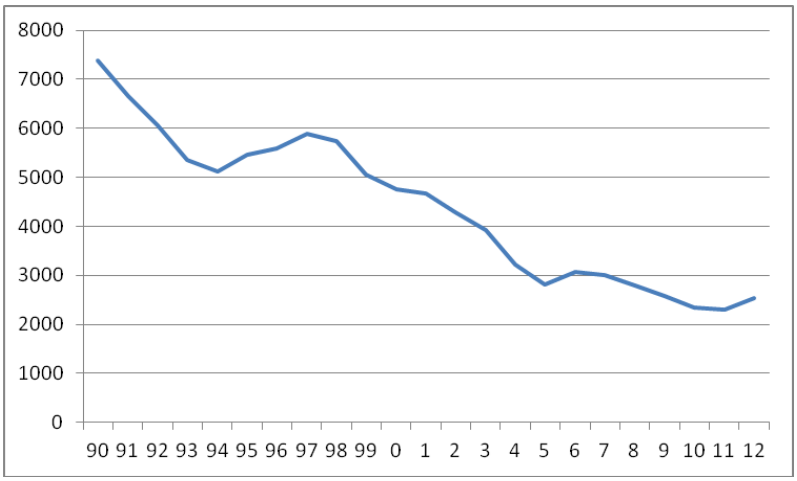
10/ Select the row of sums, left click on Insert/Line/2D. edit the X axis scale to produce this form of graph – in this case Fatal and Serious Collisions at all sites regardless of when each site was commissioned as long it was 1994 or later. As the last camera included in this data was commissioned in 1998 we can be sure that no selection bias is involved in 1999 to 2012



Astonishingly, TfL and others have long claimed the whole of these superficially impressive falls in accident or casualties at camera sites as being due to the presence of their cameras. There is a wide selection of words and phrases to describe such claims, for now "unmitigated drivel" will suffice.

11/ Now obtain from the DfT's annual "Reported Road Accidents GB" files the equivalent data for the whole of London and copy it into an empty row at least 4 rows below the sums previously generated.

12// Define a new row of cells immediately above the previous one as being the difference between the previous two, i.e. (in this case FSC) in London but not at sites, and draw a graph in the same way, as below:



Here we see that FSC's also fell markedly over the same period – and also that only 17% of FSC's occurred within TfL's sites, inherently limiting their affect on overall data even if they had any effect.

It now clearly necessary to compare the reductions at sites with the reductions not at sites, to identify the contribution made by cameras.

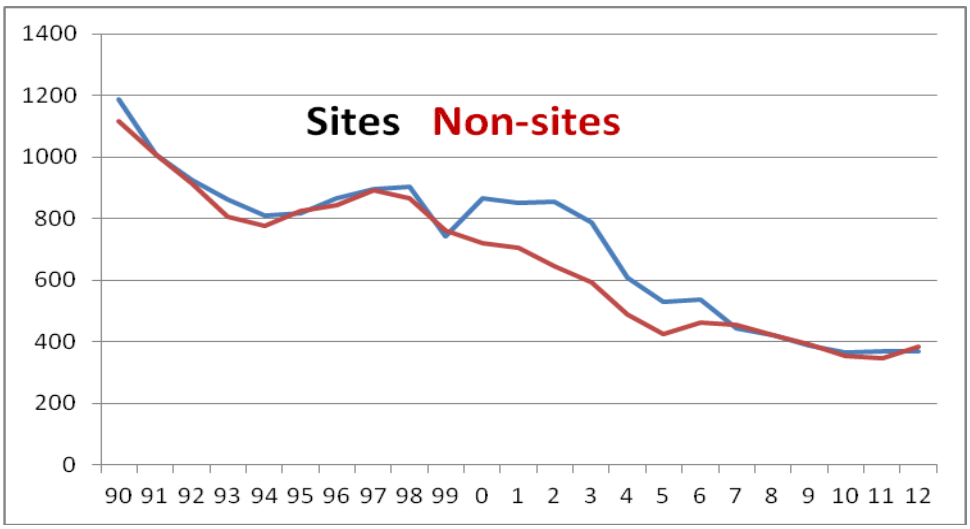
12/ Specify the 1990 cell immediately below the sum for that year as **"=A * B / C**" where

A is the site total (in 1990 for FSC, 1186)

B is the non-site total (in 1990 for FSC 7386)

C is the Cell Reference of the 1990 non-site data 7386

13/ Left-click on the 1990 cell immediately below the site sum for that year, right-click on the little black dot on the bottom right corner of the black perimeter that appears and "wipe" that 1990 cell all along the row to the 2012 column. This scales down the non-site data to match the site data in 1990. Draw the following graph in the same way as before:



It is often necessary to fine-tune the scaling factor (a) to achieve the best match in the first few years before the relevant cameras were installed and (b) because given a large number of sites, it is improbable that the blue graph for sites selected for higher than normal accident rates in the recent past would be lower than numbers not selected in that way. For those reasons scaling matches the two graphs in 1991 not 1990 though the difference is not significant.

This graph tells us that

a/ Site numbers will usually be higher than non-site numbers simply because they have been selected for their recently high accident rates.

b/ For the same reason, non-site numbers will usually be lower than the overall trend because they have by default been selected for lower recent rates – but because they are scaled down by a factor of 6 or so the difference is not visible.

c/ The varying extent to which site selection bias pushes the blue site graph above the non-site trend, compounded by the spread of installation dates across the entire period makes it impossible to differentiate camera effect from selection bias/regression to mean effects over the entire period in which selection bias exists.

d/ By excluding sites commissioned before 1994 and checking that the two trends run close in 1990-1992 we can be reasonably sure that those early years are essentially free of selection bias and we know that as selection(obviously) must end before commissioning there is no selection bias after 2008.

e/ Accordingly it is entirely legitimate to compare accident rates at sites and elsewhere in 1990-1992 with the same rates in 2009-2012, while ignoring what happens in between due to selection bias and (supposed) camera effect.

f/ That selection bias was clearly greater from 2000 on than before was due to selection having BEEN less formalised in the early years but then, under Hypothecation Scheme rules, WAS based more on minimum KSI levels in the 3 years selection periods.

g/ Finally and most importantly, when we compare accident rates properly, before selection bias changed the numbers, and after it had ceased to do so, **there is no meaningful difference whatever between reductions in accidents where there are cameras and where there are not. And, although only Fatal and Serious Collisions are shown here, the same applies to all combinations of parameters.**