

Ph (44) 01730829416

Mobile (44) 07717222459
e-mail irfrancis@onetel.com
GU321LD

Sunny Bank,
Church Lane
West Meon,
Petersfield,
Hampshire
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Personal Attention of the Chief Constable,
Humberside Police,
Priory Police Station,
Priory Road,
Hull, Humberside HU5 5SF

Your ref IX306/12

Safer Roads Humber:- False Claims in 2010/11 Report

Dear Chief Constable,

In May I wrote to your Force to file a detailed complaint against Safer Roads Humber in respect of their blatantly false claims for speed camera benefit in their 2010/2011 Report, on the basis that their conduct first in publishing that false and seriously misleading information, and later in repeatedly refusing to withdraw it, must amount to misconduct in a public office and perhaps one or more other criminal offences.

My complaint also pointed out that as your own Force is directly involved in Safer Roads Humber, it would be invidious for you to investigate my complaint itself but should refer it to another Force not tainted by a similar association.

For a reason I have yet to understand, my complaint, primarily against civilians employed by Safer Roads Humber, was investigated by your DI Stu Miller of your Professional Standards section, whose remit, I would have thought related to the conduct of police officers in relation to their terms of employment.

DI Miller flatly refused to record my complaint, giving as one reason his extraordinary view that he "*.. cannot envisage a scenario where the publication of an annual report can cause a breach of a statutory duty of care*". I assume that he must mean that, however preposterous the claims, however serious the consequences of the false information provided, whatever the intent, such conduct could never amount to a criminal offence. **I refuse to believe it.**

DI Miller also sought to give the impression that the Perjury Act 1911 relates only to sworn testimony under oath, although I had already pointed out to him that it explicitly covers the publication of false information in public documents. He has failed to respond to that point in any way.

I am in the process of taking legal advice on what I still believe to be the criminal conduct of those involved, as well as reporting them to the Local Government Ombudsman and also reporting to the Cabinet Office those individuals at the DfT who are similarly involved in this preposterous analysis. However, whether or not this conduct is criminal, or amounts to breaches of the different codes of conduct of local government employees or central government civil servants, **the fact remains that the claims are ludicrously misleading and must be withdrawn** before they further influence policy makers and spending in Humberside or anywhere else to continue both to waste public money and put lives and limbs needlessly at risk on our roads.

Another of DI Miller's astonishing statements was that "*.... Humberside Police as a partner of Safer Roads Humber supports and endorses*" the East Riding Council response on behalf of Safer Roads Humber to refuse to withdraw the report". He did not state **on whose authority or after what analysis** he wrote those words. As the precise meaning of that sentence is not clear, it seems to me that it must mean one of three things, that:

a/ Humberside Police **believe that claims made in the Report are (at least substantially) correct**, and therefore sees no reason to withdraw them, or

b/ Humberside Police **have not assessed the claims or my complaints** about them, preferring not even to consider whether or not the claims are false before supporting them, or

c/ Humberside Police **have considered the claims**, in the context of the detailed information and analysis provided, **knows perfectly well that the claims are absurd** and that my complaints are justified, but (in the spirit of preferring to save face rather than save lives with which I have become wearily familiar over 10 years) still refuses to have the claims withdrawn.

I set out in the detailed data, analysis and correspondence at

<http://www.fightbackwithfacts.com/humberside-safer-roads-false-claims/> why these claims of camera benefit **cannot remotely be justified** either in terms of accident reduction or the costs those reductions achieve for the country. No doubt you or someone else who understands basic arithmetic and elementary statistics - including quarts and pint pots - will find time to look at the evidence before you reply (though a prompt acknowledgement would be appreciated). Here I need provide only a **basic summary to demonstrate how preposterous the claims are:**

1/ It is literally **impossible for speed cameras to reduce accidents by 10 or 20 times the proportion that ever involve speeds above the limit** in the first place, still less so when, typically, they cut the numbers speeding by **only one third**.

2/ Although the raw data might be reasonably accurate in terms of accidents reported to the police (a clear minority in terms of non-fatal accidents), **accidents at camera sites fall for many reasons in addition to camera effect**, including:

"Regression to the mean, some drivers diverting to avoid cameras and other changes in traffic flow, and long term trend"

Not my words, but those of **Professor Richard Allsop**, who wrote the 2010 RAC Report into speed cameras, in an email to me dated last Saturday, 4th August 2012.

Or as **Hampshire Police** confirmed to me in an email dated 31st July 2012,

"In respect of any analysis itself, it is not possible to isolate any improvement that may be attributed directly to safety cameras since the installation of such cameras is likely to be one of many options employed at a site to reduce collisions."

For these and other detailed reasons available on my web site, **it is therefore utterly preposterous for Safer Roads Humber to claim**, and for Humberside Police to support them in claiming, that **the entire fall in casualties at their camera sites over periods as long as eight years was due to their cameras and in no way whatever due to any of these other factors**.

I hope you - or whoever you delegate your understanding of such matters to - will now recognise that **whether these claims are true or false is not and cannot be a matter for debate - they are undeniably false**. Anyone foolish enough to stand up in front of a class of fifteen year olds, let alone in a court of law, would be laughed out of court, as the saying goes. Unless sent to jail, a secure institution or on a three year intensive course of study to qualify as a half-wit of course.

I turn now to the **values applied by Safer Roads Humber** to those accidents they claim they saved. Again, greater detail is available on the web pages, so in summary only:

1/ A very substantial proportion of the "cost" figure is an **entirely hypothetical and subjective figure for the "value" of pain and suffering avoided**. While I have no objection in principle to assigning such notional values and understand how it can be helpful, the fact remains that it is a **"value" not cash**, that it occurs is no known ledger in any State or private sector accounts and, as the National Audit Office has confirmed, **should not be treated as if it were cash**.

Yet not only is this what Safer Roads Humber do in their **wildly inflated claim of "£73,223,760 saving"** but also, in another flight of utter arithmetical fantasy, they quote their figure (based as it is on the shifting sands of **large annual variations and subjective estimates**) to **7 significant figures or 1 part in 7 million!** That ludicrous degree of pretended accuracy would have earned me or my friends a sharp **rap of the knuckles with a stiff ruler, if not the cane, in the my Third Form days, or a P45 if the culprit worked for my company.** **The format alone of that number** confirms that whoever wrote that sentence has no understanding of the subject.

The **other major blunder** in the valuations (a blunder which I am still waiting for the DfT to admit to and correct) is what they refer to as "**lost output**" but which Safer Roads Humber refers to both as the same and also as "**lost earnings**". These figures are **nothing less than infantile fantasy - no output is lost**, because in any economy output is almost entirely determined by demand, not by labour **availability**.

And although the casualty may well lose earnings, someone else takes his place so that there is no net effect on the State. To believe otherwise would be to believe that anyone running a business - or a Police Force for that matter - would, on hearing of that a member of staff would not be available for work due to injury or death, would shrug his shoulders and **accept for the duration of the incapacity the loss of output represented by that person's work.** Of course he does **no such thing**, instead reaching for the telephone to **increase overtime, hire a replacement, work more efficiently - or in default of any of those, lose that business to a competitor** who does, to ensure that, as always, demand is matched by supply.

This is also the **case when the casualty dies**, when the loss of his **share of demand** automatically results (on average and over time) with a **corresponding loss of output.** However **output per head** - which is ultimately what matters - remains unchanged with **no net loss to the State.** The values used by Safer Roads Humber are therefore largely nonsense - for instance, the real cash cost of a fatal accident is on average more like **£20,000 than the £1.6m often quoted.**

The overall effect of this reality check is that the claims of Safer Roads Humber, first ludicrously overstated in terms of accident and casualty numbers, are then **stretched even further into La La Land** by being multiplied by nonsensical cash figures, to achieve their preposterous "**£73,223,760 saving**".

If as seems likely, Safer Roads Humber's operating costs are of the order of **£2m pa**, the total over the 8 years covered by the claim would be around **£16m**, with a benefit/cost ratio of **4.6 to 1.** However adjusting that figure just for the wildly overstated accident and casualty reductions inevitably reduces benefits to **well below costs**, while correcting them further for the wildly overstated cash values **reduces possible benefits to derisory levels compared to those costs.**

ENOUGH IS ENOUGH! This self-serving nonsense has to stop, taxpayers and road users deserve no less, and I look to you as Chief Constable to put a stop to it without further delay. While I await your confirmation I will continue using whatever other avenues are open to me to bring this nonsense to an end. And while you are considering these subjects you might read

<http://www.fightbackwithfacts.com/cameras-versus-activated-signs/> which shows how **vehicle activated signs costing less than £1,000 pa provide at least similar benefits to speed cameras costing £50,000 pa.** Food for thought perhaps, even if your Force and all others **chose to ignore it** when I first circulated the information in 2007?

Yours faithfully,

Idris Francis