

SAFETY CAMERA REVIEW – WORKSHOP AND CONSULTATION ANALYSIS

THEME 1 – PURPOSE AND REMIT OF SCPs

Question 1 - Do you consider that the existing remit still reflects the fundamental requirement of the Safety Camera Programme or do you consider that it should be widened or given greater flexibility in its deployment?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Evidence based casualty reduction should remain at the core of the safety camera programme as any move away from that could undermine public confidence and acceptance of cameras. • There should be scope to use cameras more proactively to prevent accidents and address public concerns and success criteria developed 	<ul style="list-style-type: none"> • Generally broad support for the existing remit and that the Programme should continue to be evidence based • Mixed picture regarding community concern: message that remit should allow flexibility to address community concern; remit should be widened so that community concern can be addressed; and more inclusive site selection could include more community concern • Alternative message that community concern should be remit of the Police rather than the SCPs, and that community concern sites pose a potential risk to the Programme's public support as lack of evidence base. Perception should not trump evidence. • Remit could consider future technologies • Potential role for education in Programme remit • Potential scope to broaden remit (examples provided include double yellow parking, schools, heavy pedestrian areas) 	<ul style="list-style-type: none"> • Programme should remain evidence based • Remit should retain casualty reduction at its core • Scope for remit to consider more flexible camera deployment • Community concern should be outwith remit (and risks undermining Programme) • Potential for remit to consider alternative approach for camera use

Question 2 - Changes in camera technology and other ongoing developments on the road network have created opportunities for the Safety Camera Partnerships to support enforcement activity in other areas such as Traffic Management Intelligent Transport System (ITS) schemes and at road works.

Given the varying demands for camera enforcement how do we ensure there is flexibility to support enforcement activity without compromising the casualty reduction strategy?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Use of cameras at roadworks and for any purpose other than casualty reduction/prevention such as managed motorways will need to be properly funded and resourced to mitigate or minimise any impact on casualty reduction objectives. • Funding should not be linked to payment of fixed penalties or fines. • The current Handbook is out of date and needs to be updated to ensure cameras are used to deliver their full potential in terms of the programme purpose. • Site selection criteria should be updated to reflect current accident densities, trends and availability of new technology. 	<ul style="list-style-type: none"> • General support of ITS in principle as a traffic management tool, but this must not dilute casualty reduction purpose of Programme • ITS and roadwork enforcement should be separately funded and resourced from core programme activity • A separation of ITS and roadwork enforcement. Roadwork enforcement is a road safety issue and the contractor should pay for this. It should not be viewed as an alternative to Health and Safety • If ITS adopted, opportunity to utilise SCP back office function • Suggestion to introduce hypothecation at ITS/roadworks sites • Consideration should be given to measuring ITS effectiveness and whose responsibility this should be. 	<ul style="list-style-type: none"> • Acceptance in principle of ITS camera deployment, but as a traffic management rather than road safety tool • Funding for ITS enforcement should be separate from core Programme funding • Programme purpose should not be diluted • Contractor to pay for enforcement

THEME 2 – STRUCTURE OF SAFETY CAMERA PARTNERSHIPS

Question 3 - Which is your preferred Safety Camera Partnership structure in order to deliver an effective and efficient Safety Camera Programme?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Partnership working arrangements are key to delivering successful outcomes. • The current eight partnership structure is delivering programme objectives and although not replicating Road Policing delivery structures, boundaries align with new Police Scotland divisions • Any proposals to change existing structure must have tangible benefits. • Police Scotland IT constraints will mean that back office provision will continue to be needed in each of the legacy force areas for the foreseeable future so this is not the right time to consider change. • Alternative structures could work, and could deliver greater consistency in working practices. • Local authorities are concerned about the potential lack of local accountability that could result from the creation of fewer but bigger partnership structures 	<ul style="list-style-type: none"> • A range of preferred structures, from one national partnership to more than eight partnerships • Of those expressing structural preference, strongest preferences for: eight partnerships (most, though not all LA responses); three partnerships (regional); and for there to be more than one partnership (national) • Message that principles guiding structure more important than the structure itself. Of these, localism agenda has an important role, as does public perception of structures • Geographical boundaries shouldn't limit activity and preferred structure is simply the one which enables the best Programme • Review offers an opportunity to deliver improvement • No structures proposed in document therefore simply want the most effective option 	<ul style="list-style-type: none"> • Range of views on structures – preferences for eight or three, with little support for one (national) partnership • Structure should deliver the most effective programme and real benefits • Local agenda important to partners • Alternative structures could deliver benefits

Question 4 - Do you consider that there should continue to be a dedicated local communications resource for each Safety Camera Partnership or would a national communications team provide greater opportunities? If the resource is to remain within the Programme what should the proposed structure look like?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • There is a need for good communications aimed at influencing driver behaviour, to develop and deliver consistent messages both internally within partner organisations and publicly. • The benefit of good liaison with local media and community based groups should not be underestimated 	<ul style="list-style-type: none"> • Range of responses – benefits seen in a national <u>and</u> local resource for each partnership • National provides consistency and pooling of resources. Importance of local links • Comms resource should be independent from PS and LAs • Alignment of comms resource with RSS 	<ul style="list-style-type: none"> • Local resource has benefits of local knowledge • National resource can deliver consistency • Alignment with RSS

Question 5 - Do you consider that there are functions that could be delivered by alternative methods?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Share capacity and services where appropriate • Consider data analysis/collation (crash and speed analysis) function and role of LAs in this • Avoid duplication, and recognise duties on partners • Potential for speed awareness courses • Apply economies of scale where appropriate 	<ul style="list-style-type: none"> • Consider data analysis/collation (crash and speed analysis) function and role of LAs in this • Avoid duplication and recognise duties on partners • Look to share capacity and services, and apply economies of scale, where appropriate

THEME 3 – GOVERNANCE

Question 6 – the Scottish Safety Camera Programme is currently a standing agenda item for discussion by the Strategic Road Safety Partnership Board (SRSPB), established under the Road Safety Framework to 2020. What, if any, role should the Board have in reviewing the performance of the Safety Camera Programme?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • The SRSPB should have an oversight of the Safety Camera programme. • Strategic changes to the Handbook could be presented to the Board for discussion and agreement before being implemented. • Consider the creation of a safety camera operational group. 	<ul style="list-style-type: none"> • Generally supportive of a role for SRSPB in the Programme. Mixed responses as to whether it should scrutinise the work. • SRSPB should make recommendations on strategic development opportunities, highlight benefits of the Programme and ensure that the Programme continues to be justified through contribution to casualty reduction. • Suggestions that SRSPB could ensure: consistent national delivery; that resources are deployed to maximise road safety benefits; and propose joint working (where appropriate) • Alternative comments suggested that inappropriate for the SRSPB to discuss detail of safety camera business given wide remit and infrequency of meetings. Board members may not have sufficient knowledge of cameras to govern the Programme effectively. • Alternative suggestions to SRSPB scrutinising the Programme included the potential for another group (sub-group of Board), or Programme Office to hold responsibility for detailed monitoring, to ensure consistency, to provide a single voice for the Programme; and to provide updates and statistical reports to the Board. This 	<ul style="list-style-type: none"> • Agreed requirement for involvement of an overseeing strategic body • Some differences of opinion regarding role of SRSPB, ranging from providing scrutiny to advisory • Suggestion for a camera-specific governance group to produce updates and statistical reports to the SRSPB • Ensure national consistency across programme • Suggestion for Board to make recommendations and approve any proposed strategic changes to the Programme • Suggestion for the programme to have a single national voice

	<p>group would be accountable to the Board.</p> <ul style="list-style-type: none"> • One suggestion that CPPs could be considered for governance of the Programme as this may assist in a more co-ordinated approach in relation to other interventions. • Also observed that governance of the Programme could not be addressed until the eventual structure was determined. 	
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Question 7 - Each partnership has a local stand-alone Management Board or Steering Group established as required for consideration of funding through the programme, and in terms of a local Service Level Agreement (SLA) or Memorandum of Understanding (MoU). Is there a continuing need for local Management Boards or should it only be necessary to have local working groups to deal with practical issues such as site identification, site maintenance etc.?

If there is a continuing need, what functions should local management boards have responsibility for?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • There should continue to be a local management board chaired by local authority and providing local accountability. • Need to consider the impact that any change in structure would have on local boards. 	<ul style="list-style-type: none"> • Support for continuation of local Management Boards and the key role they hold within the Programme. • Main functions were to ensure local voice and focus; oversee/review performance; hold local management to account; provide a key role in delivery; ensure compliance of partners with SLA/MOU. • Mixed messages concerning directing/advisory functions, and mixed views on membership being restricted to cost-incurring partners or widened to include wider interests, e.g. SFRS, NHS. • In addition to the local management boards, there was a recognised need to maintain operational working groups. • Recognition of important linkages with CPPs 	<ul style="list-style-type: none"> • General agreement for local Management Boards to continue • Differences between strategic and operational roles recognised and indicated the need for working groups, in addition • Roles of Management Boards include: ensure local voice; ensure compliance to SLA; and oversee delivery and performance • Consider impact that change in structure may have on some partnerships.

Question 8 – who should be responsible for making deployment decisions – the police, local management boards, or partnership managers?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Strategic deployment direction should be set out in the Handbook. • Operational deployment decisions should be made by partnership managers with influence from the local management board. 	<ul style="list-style-type: none"> • Support for SCP Managers as the most appropriate holder of day-to-day operational responsibilities. • Generally broad support for SCP Boards to provide strategic direction. • Some recommendations were made for input to day-to-day deployment from project boards and/or working groups • A number of responses suggested that the SCP Manager in conjunction with PS should make decisions, with two favouring Police in the first instance. • Two responders suggested that Local Authorities would be best placed to make deployment decisions and one suggested that CPPs would be best placed 	<ul style="list-style-type: none"> • Support for SCP Managers to hold responsibility for deployment decisions, although with input from others. • Support for Partnership Boards to be involved at a strategic level

Question 9 – how might the functions of the Local Management Team be provided in the future?

WORKSHOPS	CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Consider opportunities for further sharing of staff. • Consider alternative ways in which the road safety message could be delivered, i.e. face-to-face contact, social media, etc. 	<ul style="list-style-type: none"> • From the variety of responses received it appears that there has been some confusion over the meaning of the question; however the main points raised are listed below: • An ongoing requirement for local SCP Managers, Comms Officers and Data Analysts, as the local focus and flexibility this affords is essential. This team was seen to be central in determining local requirements, targeting enforcement, monitoring, reporting and engaging with stakeholders. • Dependent upon the eventual structure, there is potential to share some of these resources. • Importance of comms and data analysis roles was stressed along with comment on the importance of adequate funding for these roles. • A number of suggestions that national bodies such as TS or PS could fulfil some of the functions. 	<ul style="list-style-type: none"> • Local engagement and management seen as important • Potential sharing of resources dependent on the eventual structure • Importance of input from comms and data analysis

THEME 4 – SITE SELECTION AND DATA

Existing site criteria

Do you consider that the existing site selection criteria for accident reduction purposes continue to be an appropriate means of identifying potential new camera sites, or should the criteria be modified to take account of alternative or additional factors?

WORKSHOPS	FOCUS GROUP	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Current site selection criteria is inappropriate and out of date • General agreement on a points based system, revised as appropriate. Alternatives could include a two stage process for site identification (long list then short list), consideration of accident times, and a different separation of collision types • Criteria should exist for average speed camera schemes • Lord Advocate guidelines introduce a lack of transparency and should not apply to site selection • No concrete alternatives to existing exit strategy, however agreement of their importance and that improved strategies required. VAS an option. 	<ul style="list-style-type: none"> • If casualty reduction remains at Programme's core, criteria should align with this • Revised points based system appears most appropriate methodology. Agreement that existing 5:1 ratio is not viable and should be lowered • Selection process to be formalised. Two-stage process with criteria used to identify long list of sites before partners identify those where camera is appropriate intervention and with greatest casualty reduction potential. Identification to be camera-technology neutral and consideration of cost-benefit analysis. • Remove Lord Advocate's guidelines from site selection process with suggestion that sites can be considered at a percentage above the posted speed limit • Guidance in Handbook on minimum requirements for speed surveys • Formalise review and exit strategy within Handbook. There should not be a separate decommissioning group. • With limited resource, exit strategies to focus on greatest potential for accident reduction 	<ul style="list-style-type: none"> • Points based methodology to remain with revised ratio • Two-stage identification process (long list/short list). Roads authorities to identify long list of potential sites, and to include input from key partners. • Speed threshold in site selection process to be transparent and percentage linked • Review and exit strategy formalised

Exception sites

Do you think that the Programme should have the ability to deploy cameras on roads which do not meet accident/speeding criteria? E.g. to respond quickly to community concerns or complaints regarding speeding; creating ‘route strategies’; road works; or traffic management.

WORKSHOPS	FOCUS GROUP	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Lack of agreement on the use of community concern sites, or otherwise, and the levels at which they're adopted. If adopted there should be a basic level of criteria. • Community concern deployment should not be at the detriment of core sites and risk diluting the Programme. • Multi-agency agreement and approach to community concern sites. • If cameras deployed for traffic management/ road works/ ITS, funding should be allocated separately and not from core SCP budget. • Role for community policing in community concern sites, rather than the SCP. • Casualty reduction objective should not be perceived to be diluted. • Cameras should remain the last resort. 	<ul style="list-style-type: none"> • Clarity required in Handbook around nomenclature – community concern/exception sites • Revisions to criteria will potentially reduce demand for community concern sites • 15% community concern is an arbitrary figure • <i>General</i> agreement that community concern sites require strong governance to ensure no dilution of Programme • Acceptance of community concern sites rather than support for them, and acceptance that policy decision on this falls to SG, as Programme funder. 	<ul style="list-style-type: none"> • Exception sites to be focussed on sites of community concern (traffic management and ITS addressed separately) • Revised site selection criteria has potential to address community concern sites not currently picked up • Community concern sites require appropriate evidence base and partner support • Government should make policy decision on community concern

Evidence base and Data

Do you think the Programme should continue to be an evidence-based initiative? If the remit of the Programme expands, what data should be collected to measure the effectiveness of cameras in different scenarios?

WORKSHOPS	FOCUS GROUP	SUMMARY OF VIEWS
<ul style="list-style-type: none"> Broad agreement that Programme should continue to be evidence-based. Need to consider qualitative as well as quantitative data as one of our objectives focuses on influencing driver behaviour. Cameras introduced for purposes other than casualty reduction should be monitored and reported separately. 	<ul style="list-style-type: none"> Crucial that Programme remains evidence based Consideration of Richard Allsop methodology to account for regression to the mean (RTM), i.e. collecting data three years prior to the three year baseline. http://www.racfoundation.org/assets/rac_foundation/content/downloadables/speed_camera_data-allsop-may2013.pdf Clear guidance required on how speed surveys should be conducted. Cameras introduced for purposes other than casualty reduction, i.e. at road works or traffic management schemes, should be monitored and reported separately. 	<ul style="list-style-type: none"> Must remain evidence based to maintain public support. Consider introduction of national opinion survey (qualitative data). When reporting, need to take account of RTM. Cameras installed for purposes other than casualty reduction to be reported separately. Data collected must be of a high standard and suitably validated.

Key Performance Indicators

Should consideration be given to reviewing the existing KPIs and, if deemed necessary, introducing new ones to drive the Programme towards its aims and objectives?

WORKSHOPS	FOCUS GROUP	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Existing KPIs don't measure performance and should be revised. Deployment hours are the key measure and can be influenced. • Greater consideration given to use of statistics rather than KPIs. • Performance should not be linked to funding. 	<ul style="list-style-type: none"> • Agreement on need to measure performance • Divide performance indicators - SCP performance and Programme performance • SCP performance to include measuring speeds, adhering to Handbook rules, timeous submission of information, deployment hours etc, • Programme performance – casualty reductions and contribution to wider targets. Stats report 	<ul style="list-style-type: none"> • KPIs to be revised • Programme's casualty reduction and Partnership's performance management to be measured separately • Enables benchmarking and comparison

THEME 5 – FINANCE

Is there a desire for local authorities to continue as treasurer for the safety camera partnership or should alternative arrangements be considered?

WORKSHOPS	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Local Authorities should continue to provide the role of treasurer. • Clarity required as to whether it is permissible for local authorities to pay for goods used by SCP (Police) staff, i.e. fuel, stationery, etc. • Processes need to be standardised across Scotland. • Guidance required from HMRC in relation to Police Scotland VAT implications. • Potential for funding to cover VAT 	<ul style="list-style-type: none"> • Local Authorities are content to retain partnership treasurer role under Section 46 of the Local Government (Scotland) Act 2003 – Power to provide funds for speed cameras etc. • Need to consider the impact that any structural change would have on the role of the treasurer. • Work with HMRC and VAT consultants to determine whether it is appropriate for a single partner to pay for all activity relating to a given partnership.

How does the role of a partnership treasurer vary across Scotland?

WORKSHOPS	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • There is a requirement for standardisation of procurement and invoicing procedures. • Consider the introduction of an annual SCP treasurer's meeting 	<ul style="list-style-type: none"> • Standardisation of processes. • Establish an annual meeting of partnership treasurers to enable sharing of best practice.

There are vast variations in the costs associated with the work of the safety camera partnership treasurer. Can you suggest a suitable process for equitable payment of partnership treasurer's time?

WORKSHOPS	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Introduction of standardised charging for SCP treasurer's time. 	<ul style="list-style-type: none"> • Standardised process for charging for treasurers time.

There are variations in the costs associated with annual safety camera partnership audits, with some partnerships charging thousands of pounds whilst others charge nothing. Can you suggest a standard charging procedure for audit costs?

WORKSHOPS	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Given that budgets have diminished greatly since the creation of the SCPs, the requirement for separate external audit should be clarified. 	<ul style="list-style-type: none"> • Audit should fall under wider Transport Scotland audit with potential for SSCPO to dip sample.

Question 10 (consultation document)

If you have any further comments on the purpose, structure and governance of safety camera partnerships not addressed by the previous questions, please submit these below:

CONSULTATION RESPONSES	SUMMARY OF VIEWS
<ul style="list-style-type: none"> • Number of responders reiterated importance of maintaining casualty reduction as Programme objective • Concern at potential dilution of core crash sites in order to address community concerns • Work of SCPs should continue to be evidence led and measurable • Importance of roads authorities being individually involved and represented • SCPs have made positive contribution to road safety and maintaining formal criteria is important for focus and consistency • Reference made to importance of data analysis and communication. • Current structures are a good starting point • Concern at the current site selection criteria restricting ability to install safety cameras in areas where they could contribute to crash reduction • In contrast to concerns over dilution of crash reduction, request to consider camera activity at sites with no crashes but with excessive speeds. • Requirement for consistent speed measurement practice • Central purchasing scheme may offer leverage and savings. • In-car safety technologies could reduce need for cameras in the future. • Greater consultative process requested for motoring organisations • Scope to expand programme to cover other areas of road traffic legislation • More than half of responders did not offer any further comments. 	<ul style="list-style-type: none"> • Importance of maintaining casualty reduction as core objective of programme, without dilution resulting from preventative measures or other competing demands • Importance of evidence-led approach being maintained • Importance of roads authorities being key players • Importance of data analysis and communications to the programme • Concerns over current site selection criteria prohibiting the creation of new sites