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Email [REDACTED]

Mr H Shah  
Assistant Coroner  
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07 January 2015

Dear Mr Shah

Leanne Carman Gower (deceased)  
Letter to prevent future deaths

Further to your Regulation 28 report of 19 November 2014 I have noted your concerns and I provide the following information in response.

#### Actions taken

I have reviewed our position in relation to the collation, checking and provision of non-injury, damage only collision data and can clarify the position of Northamptonshire Police with regard to this.

#### Procedure

When a member of the public telephones to report a road traffic collision, the following information will be obtained:

- Has anyone been injured?
- Is there any danger requiring immediate action by any of the emergency services?
- Is there any obstruction to traffic?
- Are there allegations of offences being made against another driver/person?
- Do the circumstances warrant the attendance of a police officer?

If the answers to all the questions are negative the caller will be informed of the provisions of Section 170 Road Traffic Act 1988 and the drivers' responsibilities to exchange:

- names and addresses
- details of the owners of the vehicle
- vehicle registration marks
- the fact that the police will not be attending and no police collision report will be prepared.

## Requirements

All Police Forces have a requirement under the Department for Transport regulations to record data on all collisions involving death or personal injury on the public highway, and in which one or more vehicles are involved. This data is called 'Stats 19' and is used for the purpose of delivering casualty reduction and road improvements. The format of the reporting ensures that it nationally consistent.

The 'Stats 19' data collected by Northamptonshire Police is sent to Northamptonshire County Council for collation and onward transmission to the Department for Transport.

There is no requirement by the DfT for Police Forces to record non-injury damage only collisions. In line with the procedure above, damage only collisions which are reported to the police will be noted on the command and control log and given an incident number. In most cases, unless necessary, no further action is taken.

## Position of Northamptonshire Police

At a meeting of Chief Officers on 16 September 2011 it was agreed that damage only collisions would only be recorded where road traffic offences were disclosed. This decision was implemented in January 2012 and the procedure outlined above took effect.

## Overview of the reporting and recording of road traffic collisions.

The question is raised that the policy of dealing with damage only collision information should be reviewed to determine if the use of such information could contribute positively to reducing casualties.

This question needs to be put into the national and local context in order to inform what, if any, action should be taken to utilise damage only information.

Reference is made to the following document 'Reported Road Accident Statistics' SN/SG/2198 updated 24 October 2013, a Parliamentary briefing paper. This document acknowledges that the STATS 19 database figures are recognised as being an incomplete count of both collisions and casualties, although figures on fatalities are generally acknowledged to be robust.

It is apparent that the system has flaws due to underreporting by those not able to or not wishing to notify police of their involvement in a collision. There are other reasons for underreporting of personal injury collisions but with regard to damage only collisions, it is believed that the scale of underreporting may be even greater.

Research into the extent and nature of underreporting is ongoing but has not yet been conclusive in terms of the scale of the problem. Chapters 5 and 6 of 'Road Accidents in Great Britain 2008' provide a summary of research findings into this issue at that time. In July 2009 the UK Statistics Authority published their assessment of road casualty statistics and they too concluded that the underreporting of road collision casualties is a significant and intractable problem.

Bearing in mind the issues recognised to exist with the reporting and recording of personal injury statistics, the recording of damage only data presents even greater

difficulties. There is a working partnership between Northamptonshire Police and Northamptonshire County Council to reduce road casualties and the following comments have been made by [REDACTED] Road Safety and Sustainability Team Leader, Northamptonshire Highways:

'The police no longer routinely attend or record non-injury collisions and the Department for Transport do not require this information from local authorities. It is therefore a fact that the vast majority of damage only collisions are not directly recorded by the police and anecdotal information is notoriously unreliable. Reports of non-injury collisions to the police are noted on a messaging log and tend to provide the briefest of detail.

The absence of precise, validated and corroborated locations for incidents therefore renders any attempt to accurately identify collision sites with any degree of confidence. It should also be born in mind that, for the purposes of the Road Traffic Act, the most insignificant damage to a vehicle or property would constitute a non-injury collision. Provided that all the conditions of the Act are met then there is no obligation for a motorist to report a non-injury collision to the police.

Where non-injury collisions are recorded by the police, details are again very brief and held in their administrative system for reference purposes. Reports are not forwarded to Northamptonshire Highways and we do not have the resource capacity to input the detail on our database.

To put this in context, we currently input around 1200 personal injury collisions per year on our database and the police file around 2,500 non-injury collisions in their system. This is in hard copy form and presents no opportunity to interrogate, validate or analyse the information. We spend a great deal of time validating the data contained within personal injury collision forms in order to ensure that the information available on the database has a high degree of accuracy.

Non-injury data is therefore extremely limited, unreliable and lacks scientific rigour to determine meaningful interventions. As an evidence led process our analysts are also mindful that erroneous data could potentially create danger on the road network rather than reduce it as well as divert funding away from more serious concerns on the network'.

### Conclusion

There is no statutory requirement to collect, collate and analyse damage only data. If this activity were to be graded in terms of necessity and weighed against policing priorities, then it would likely be given a very low priority. Current financial conditions and the requirement to make significant savings would also make the need to fund staff time to deal with damage only data difficult to justify. Consequently I would not recommend that formal steps be taken to collate and analyse damage only data within this organisation. My conclusion supports the decision of Chief Officers taken in September 2011.

However I do acknowledge the concerns raised by the Coroner and propose instead to highlight this issue to the small group of officers, located around the county, who have taken on a role as road safety problem solvers. I will brief them on the circumstances of this particular incident and ask that, as part of their role, they informally report any concerns that they become aware of in relation to collision locations. Where it

becomes clear that a pattern is emerging or the number of incidents is unusual, further investigation will take place via the Safer Roads Team.



**Senior Traffic Management Officer  
Safer Roads Team**