

## Finance and Constitution Committee Questionnaire

This questionnaire is being sent to those organisations that have an interest in, or which may be affected by the [Restricted Roads \(20 mph speed limit\) \(Scotland\) Bill FM](#).

In addition to the questions below, please add any other comments you may have which would assist the Committee's scrutiny of the FM.

### Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

No. No direct contact was made with Police Scotland.

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

N/A

3. Did you have sufficient time to contribute to the consultation exercise?

N/A

### Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

No.

Paragraphs 21 to 25 of the FM, details the estimated increase in levels of speeding a reduced speed limit would generate. Paragraphs 48 to 51 detail the impact on Police Scotland. We note offence numbers in England and Wales have been used in the calculations, but Scottish data is also available and would have reflected more accurately the projected increase.

The FM quite rightly points out that the vast majority of speeding offences are dealt with by the Safety Camera Units. Safety Camera deployment is governed in Scotland by the [Scottish Safety Camera Programme Handbook](#). The focus of the SCP is casualty reduction, and the criteria for deployment reflects this. In brief, two of the criterion for deployment are; a minimum number of injury collisions (also taking account of severity), and evidence of a speeding problem. All evidence suggests that compliance with 20 MPH limits, where speed calming measures are not present, will be poor. This will mean an increase in 'speeding problems' and roads which currently fall out with the criteria, where there is no compliance issue with the 30 MPH limit, will now fall within. This will increase demand on Safety Camera Unit resources, both front line, in terms of fixed and mobile camera deployment, but also in terms of back office processing.

The FM does not capture this, and nor does it capture the impact this has on front line police officers. Where offenders fail to respond to initial correspondence, uniformed officers are despatched to make enquiries to identify and charge offenders. It is very difficult to place an estimate on the cost of this process, as the level of enquiry and time required to complete the investigation differs greatly depending on specific circumstances. Some can be concluded on a single visit to a registered keeper's address, where others involve multiple visits to multiple addresses.

In addition, many fixed safety cameras do not have Home Office Type Approval to enforce speed limits below 30 MPH. This would render a number of fixed safety cameras within the existing restricted road network redundant. The cost of upgrading would be significant.

In terms of Police Officer deployment at speed checks, Paragraph 51 estimates an officer will take about 10 minutes to issue a fixed penalty notice, at an estimated cost of £9. 10 minutes is perhaps more indicative of the time taken to fill in the relevant fields on the conditional offer, and record details in the officers notebook. 10 minutes does not include the time taken to engage with the driver, deliver any road safety messaging, carry out a cursory inspection of the vehicle, administer breath tests and conduct any system checks required. It also assumes all is found to be in order. If document or other offences are discovered, the stop can take far longer. It also assumes that the speed recorded will be such that a FPN can be offered. Often, issuing a FPN is not an option, and circumstances must be reported to COPFS.

Even where the issue of a FPN is appropriate and accepted, the estimate does not reflect the time and effort spent processing that conditional offer. FPNs work their way through supervisory officers to the Central Ticket Offices where compliance is managed and further enquiries initiated when required.

The FM assumes every FPN is accepted and complied with. A proportion (typically about 25%, less in some regions, more in others) are not complied with and this requires an officer to record an offence on the crime management system and research, write and submit a Standard Prosecution Report to COPFS. Depending on the circumstances, this SPR process can routinely take 30 - 45 minutes per report, and where foreign drivers are involved, longer still.

As detailed above, compliance with 20 MPH limits is poor, and this leads to an increase in community concern. We endeavour to address such community concerns, generally through local community officers undertaking hand-held speed checks, and a 20 MPH limit will result in additional pressure on an already stretched resource.

**5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?**

The calculations made in Paragraph 61, in terms of casualty reduction and the resultant savings calculated in Table 4, are well explained and seem reasonable.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

Police Scotland's focus is casualty reduction, and officers and Safety Camera Unit staff are deployed on roads where they can maximise casualty reduction potential. This tends to be on roads out with built up areas. Should there be a desire to increase enforcement within the new 20mph limits, as a means of promoting the change, then these additional checks / patrols would be limited, and would require additional funding. As it stands, Police Scotland have no plans to alter their deployment model, nor be distracted from their casualty reduction focus.

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?

Yes. The issue of timescales for Police Scotland is less relevant given there will be no change to our operating model.

### **Wider Issues**

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?

There may be an additional impact on Transport Scotland through the Scottish Safety Camera Programme. Details are explained within question 4.

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

There may well be future costs associated with this Bill, although none are foreseen at this stage.

Endorsed by:

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