

**Northern Ireland Road Safety Strategy 2010 -2020 Consultation Analysis Report
Annex F (6)**

**Record or responses received from organisations and individuals on proposals for
Safer Road User Behaviours**

Name	Safer Road User Behaviours Comments
NI Commissioner for Children and Young People (NICCY)	<p>In 2009, NICCY launched the report of its 'Children's Rights Review'. This research considered the aspects of children's lives in NI which are covered by the UNCRC. This included consideration of children's road safety. The research was carried out in 2007 with over 2000 CYP across NI and a range of adults, and the findings indicated the need for further measures to be taken with regards children's road safety. Concerns highlighted include:</p> <ul style="list-style-type: none"> • Risks for CYP as pedestrian or cyclist road users (with the focus primarily on the behaviour of others, rather than that of CYP) • Speed of cars, including prevalence of joyriding in some areas • Inadequate dedicated crossing points • Inadequate traffic calming measures • Travel to and from school, with particular dangers facing children and young people around school buildings due to traffic congestion at start and end of school day • Dissatisfaction with the operation of statutory walking distances <p>• Particular concerns in rural areas, including:</p> <ul style="list-style-type: none"> - Lack of pavements in rural areas -The longer distances children have to travel on buses to and from school -The irregularity of transport provision -The longer distances children have to walk to access public transport, often on unpaved and badly lit roads.
	<p>As for areas that NICCY felt should be appropriately integrated into recommendations for a new strategy, we cited the need for:</p> <ul style="list-style-type: none"> • Greater speed management initiatives • More dedicated walking and cycling routes • A review of school transport policies • Lowering of drink driving limits • The introduction of graduated driver licensing schemes <p>We recommend that the DoE take on board our Children's Rights Review recommendations in finalising the new road safety strategy.</p>
	<p>NICCY agrees with DoE's proposal to undertake an audit of road safety education services and resources to ensure that they appropriately address current road safety issues – we expect that DoE will work closely with the Department of Education on this matter. NICCY also agrees with DoE's proposed initiative to ensure that children understand the importance of road safety from pre-school onwards.</p> <p>NICCY's research findings and recommendations from our Children's Rights Review should be of benefit to DoE in finalising the proposals with</p>

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	regard to educational initiatives. We have already highlighted a number of recommendations relevant to road safety education for child pedestrians and school transport.
British Medical Association	The BMA calls for the maximum alcohol level for drivers should be reduced from 80mgs to the European norm of 50mgs in line with the recommendations of the Association of Chief Police Officers and the introduction of random breath testing.
	<p>In 2008 the Department for Transport published a review of factors related to driver distraction and highlighted a range of research evidence including:</p> <ul style="list-style-type: none"> •Inattention contributes up to 78 per cent of accidents. •External distractions (e.g. from outside persons, objects, events) are the most frequently reported cause of distraction-related accidents. •Driving performance decrements (amount by which performance decreases) have been shown as a result of distraction by mobile phones, in-vehicle information systems (IVIS), in-car entertainment (ICE) and email systems, as well as advertising billboards, variable message signs (VMS) and other distracters. •Drivers are poor judges of their performance decrements while driving.
	<p>Speeding is a contributing factor in many road crashes and can determine the severity of injuries. The majority of motorists do not perceive speeding as a serious offence and speeding is by far the most common traffic offence. In the Northern Ireland survey, 65 per cent of respondents admitted to regularly exceeding the speed limit.</p> <p>Awareness campaigns and education do not significantly influence driver behaviour. Traffic calming and speed cameras are more effective in changing driver behaviour and reducing road traffic crashes. Recent studies have also demonstrated that 20 mph zones are cost-effective and successful in decreasing road traffic casualties.</p> <p>The BMA has always highlighted the role that speeding plays in road traffic crashes, and recommends that:</p> <ul style="list-style-type: none"> •Traffic calming and 20mph zones should be implemented in towns and cities, especially in residential areas. •Speed cameras should be used as an effective way of enforcing speed limits.
	<p>Alcohol interferes with driving ability by affecting driver judgment, motor coordination and reactions. The current blood alcohol content (BAC) limit in the UK is 80mg/100ml, which is among the highest levels in Europe. Driving performance deteriorates significantly between a BAC of 50mg and 80mg/100ml, and crash risk increases⁹. Reducing the BAC limit from 80mg to 50mg/100ml has been shown to reduce serious and fatal crashes, and could be expected to save 65 lives and prevent 250 serious injuries per year in the UK¹⁰.</p> <p>Current UK legislation requires prior suspicion of driver intoxication before police can implement roadside alcohol breath testing. Random breath</p>

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	<p>testing is permitted everywhere in the European Union except Denmark and the UK. Under this legislation, drivers are unable to influence the likelihood of being tested, and research has shown that highly visible, random breath testing is effective at reducing drink driving, alcohol-related crashes and fatalities by increasing the perceived risk of detection.</p> <p>Ensuring a reduction in the drink drive limit in Northern Ireland is one of the priority policy aims and BMA(NI) has repeatedly called for a reduction to 50mg/100ml and recommends that:</p> <ul style="list-style-type: none"> •The legal BAC limit should be reduced from 80mg/100ml to 50mg/100ml. •Legislation should be introduced permitting the use of random roadside breath testing without the need for prior suspicion of intoxication.
	<p>Drugs, both medicinal and recreational, can have a detrimental influence on an individual's ability to drive safely. They can affect a driver's behaviour in a variety of ways including slower reactions, drowsiness, poor concentration, distorted perception, over confidence, poor co-ordination and erratic behaviour. Common attitudes among drug users have been identified: many were not aware of drug driving legislation, ignored anti-drug campaigns, and did not believe that cannabis impairs driving ability.</p> <p>Drug driving carries the same penalties as drink driving. Drug testing is more difficult than the accurate alcohol breath testing, due to the different metabolic excretion rates of various drugs, and the challenges in developing reliable drug tests. Drug testing systems based on saliva samples are being developed; however, none are currently in use by police. Field impairment tests (FIT) such as the 'walk and turn' and 'one-leg stand' are fairly reliable predictors.</p> <p>The BMA web resource Driving under the influence of drugs¹ (2009) outlines the effects of recreational and prescription drugs on driving ability, the legal position on drug driving, and the need for further education and awareness. The resource recommends that Governments should raise awareness among the general public of the risks of drug driving and the side effects of certain prescribed drugs that can affect the ability to drive. The resource also recommends that there should be increased funding for research aimed at developing appropriate roadside drug testing devices.</p>
NILGA	<p>In addition to the key challenges identified by the Department, it was strongly advocated that the higher incidence of collisions for those who drive for work (including those who drive as part of their occupation and those who use fleet or private vehicles to travel to meetings) should be highlighted as a key challenge to be addressed over the life of the strategy. Local government is particularly concerned that research indicates that more people are killed and seriously injured in 'at work' road collisions than in all other occupational collisions put together.</p> <p>The high incidence of collisions for those who drive for work is an issue of importance of local government. Recently, four councils worked together (namely Ballymoney, Moyle, Coleraine and Limavady) to organise a breakfast seminar for the local business community to encourage employers to develop and implement effective policies in relation to driving</p>

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	for work. The breakfast seminar was extremely well received and local businesses commented on how useful the morning had been. The seminar was relatively inexpensive to organise (costing £1,500 which included breakfast for all attendees and the costs associated with a key note speaker travelling from England). Local government would strongly recommend that this type of event is rolled out throughout Northern Ireland to highlight this serious issue and try to minimise the amount of collisions occurring for those who drive for work.
	There is mixed support for random breath-testing for alcohol, regardless of suspicion. Local government would welcome a time restriction for carrying out blood tests for drivers and riders suspected of driving under the influence of alcohol or drugs to ensure accuracy of results.
	Members further suggested that research is undertaken to ascertain the extent that driver/ rider fatigue plays in the incidence of road traffic accidents.
British Vehicle Rental and Leasing Association	Our view is that the strategy is somewhat weak in its approach towards the role of technology. We think the department should view technology as a way to aid compliance and enforcement and it should not be seen just as a punishment. With this in mind, the department may wish to consider further work and trials on intelligent speed adaptations used on a non-mandatory basis to help with speed limit compliance.
Road Safety Authority (ROI)	I am delighted with your commitment to reduce the BAC level for drivers in Northern Ireland. As you are aware legislation is before the Dail here to reduce the level to 0.05g/dL and to 0.02g/dL for professional and novice drivers. I am confident this will be passed into law later this year. I understand that you are awaiting the results of the North Ireland Review before deciding on a suitable. I look forward to seeing the review when it is published.
	I am interested in the further development of your plans to expand remedial /awareness courses in lieu of or as part of a legal sanction for offenders. This is an intervention the Road Safety Authority will examine later this year and again I would welcome consultation with you and your staff on this matter.
Michael Haslett	<p>Be tough on speeding - all speeding. The idea that when it says 30mph you are actually ok doing say 33/34mph, and this combined with the fact that your first speeding offence will just be a fixed penalty, and once caught you can be more careful thereafter, results in speeding detections having no real effect other than raising a large sum of money.</p> <p>Bring in 'Q cars/bikes" to back up cameras, etc. and pull up all offenders even those only 1mph above the stated limit. The secret then would be not just to apply a fixed penalty (no deterrent to the motorist with a few bob) but to introduce a system of naming and shaming a system whereby when you are stopped a small fixed penalty has to be paid and a special penalty notice has to be displayed on your windscreen alongside your tax disc, perhaps even with a naughty list displayed in public places and so on.</p>

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	<p>More serious [speeding] cases should be treated more seriously with community tasks being handed out to be carried out wearing bright jackets with culprit name being displayed for all to read.</p> <p>All second offences for speeding should be punished in addition to above by an order that the culprit must sit and pass a driving test within 2 years of conviction and failure to do so would involve loss of licence. They would be permitted to continue to drive for the two year period.</p> <p>Much more serious cases should result in long periods of licence loss and these orders should be issued more liberally. The authorities must show they mean business because the public presently doesn't believe this is the case.</p>
	<p>Be tough on all bad driving. Driving across the board would dramatically improve if all drivers were aware that "Q cars" and other methods were being used to detect poor driving, dangerous, careless and driving outside that laid down in the Highway Code and not only detection but penalties would be issued and not necessarily monetary fines only, again name and shame plus community service and driving education would be involved.</p>
	<p>One last thought I just want to put on paper, is the notion that the series of adverts shown on TV over a number of years now, actually shocks people into better driving and saves lives etc. I have thought for a long time that the claim was rubbish and that in fact more accidents, etc., could be caused. I have recently written a piece for the Belfast Telegraph on this subject which they may or may not publish, and I have attached a copy your information. [Note: with original letter]</p>
Road Safety Committee - North Down and Ards	<p>We support the work carried out by the PSNI in enforcing road traffic legislation. We would not wish to see any reduction in specialist Roads Policing Officers whose presence and work in giving advice and guidance where appropriate is very valuable. Camera Vehicles do not command the same respect in particular when deployed in situations which do not have a particular casualty record.</p>
Institute of Public Health In Ireland	<p>Seat belt legislation is an excellent example of a measure to protect health with currently 91% compliance for front seat occupants and 84-90% for rear occupants in the UK (including NI). Legislation should continually be enforced in this area to reach optimum compliance rates.</p>
	<p>The Department of Transport, England is currently undertaking an Independent Expert Review of drink and drug driving laws which will consider measures to further reduce the number of deaths caused by drink and drug driving. The proposals for changes to the legislative regime for drink and drug driving as a result of the Independent Expert Review should be examined for consideration in Northern Ireland. [Note: AMs84-89 refer]</p>
Daniel Mulholland	<p>Compulsory driver training/education for anyone involved in a road traffic accident.</p>

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	Compulsory driver training/education for anyone convicted of speeding
	Switching of resources form traffic parking violations to speeding.
	Employing Behavioural Psychologists within Road Safety Strategy and Research Branch to develop educational program on changing behaviours. These programs should then be made part of the Northern Ireland curriculum.
	These recommendations [Note: See other comments from Mr Mulholland] could be funded by increasing traffic road traffic penalties by a factor of 10.
	It is excessive speed that kills people nothing else!
	There should be zero tolerance for all driving offence.
	The single biggest cause of death and serious injury on Northern Ireland's roads is excessive there is no such thing as appropriate speed any speed that causes an accident is always inappropriate! It is speed that kills all road users!
	Most deaths and serious injuries happen on rural roads because this is where people speed!
	The younger age groups are disproportionately likely to die on Northern Ireland's roads, because they speed!
Freight Transport Association	<p>Drink and Drug Driving: The road haulage industry already has a significant function in informal self-policing of driving under the influence of drink and drugs. Particularly in response to the 'morning after' effect – where an individual has been drinking the night before then drives a vehicle the following morning whilst still under the influence – responsible operators have embraced their duty of care towards their staff and other road users through random breathalysing and drug tests. The DOE should support this non-statutory line of enforcement and provide operators with guidance for undertaking this role.</p> <p>The DOE should recognise commercial fleet operator's role in drink and drug driving compliance enforcement and issue guidance to operators for the management of drink and drug policies.</p>
Wine and Spirit Trade Association	The WSTA fully supports the aim of making Northern Ireland's roads as safe as possible. Tackling drink driving is a key part of this. The consultation makes clear that work is already underway to lower the drink drive limit in Northern Ireland. The Blood Alcohol Limit is an issue which has received a lot of attention; however the WSTA believes that it is essential to also recognise the importance of other measures in reducing drink driving.
	Successful information campaigns by Government and strong enforcement of the law have played a major role in shifting cultural attitudes in this area. Whilst the drink-drive limit has remained unchanged

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	in Great Britain, casualties resulting from drink drive accidents on the roads is at a historical low.
	The WSTA welcomes measures in the Road Safety Strategy to improve education, such as the proposal to introduce a system of penalties for relevant offences which includes greater use of educational courses. As the consultation document points out, any driver who has participated in the Course for Drink Drive Offenders in Northern Ireland is almost four times less likely to re-offend than someone who hasn't. This clearly demonstrates the impact that education can have.
	The industry already plays an important role in communicating messages to consumers about the consequences of drink driving and will continue to do so. The table below highlights some examples of initiatives by WSTA members to tackle drink driving. [Note: See original response for table of WSTA initiatives]
The British Horse Society	The highway code currently advises overtaking horses at 15mper, however not many motorists are aware of this. We would suggest that more is done to educate the motorist on how to overtake a horse rider safely and how to drive safely on country roads, perhaps as part of the driving test.
NI Assembly Environment Committee	<p>The Committee believes that driver behaviour remains the number one contributory factor in collisions and any course aimed at improving behaviour is to be welcomed.</p> <p>The Committee recommends speed awareness courses as a means of reducing speeding offences.</p>
	<p>Members heard evidence from the PSNI stating that the wider application of SPECS technology is needed and the Committee agrees with this as it will mean that the PSNI can move resources from motorways into the problem areas of rural roads.</p> <p>The Committee recommends the wider application of SPECS technology.</p>
	<p>Members were also supportive of the ongoing work to introduce the mutual recognition of driving disqualifications and of cross border police enforcement operations. Members heard from the Road Haulage Association and Freight Transport Association that figures for non-compliance within the industry in Northern Ireland are on the rise.</p> <p>The Committee recommends the urgent introduction of legislation on a Graduated Fixed Penalty Scheme which should ensure that figures on non-compliance within the Northern Ireland haulage industry start to improve and also recommends that the subordinate legislation from the Goods Vehicles (Licensing of Operators) Act is introduced as quickly as possible to ensure that standards are improved.</p>
	Members welcome the proposal for lowering of the blood alcohol limit from 80mg to 50mg and would like to see the introduction of legislation on this issue as soon as possible. Although members welcome the lowering of the

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	<p>blood alcohol limit, there were concerns over the accuracy of the equipment that the PSNI currently have in detecting the lower limit and feel that there may be merit in retaining the blood/urine test in the interim until the accuracy of equipment is confirmed.</p>
	<p>The Committee recommends an incentive scheme, run by pubs, in rural areas such as the provision of a minibus to take customers home and the development of a rural transport strategy.</p>
	<p>The Committee also recommends that random breath testing is introduced in Northern Ireland. However it should be noted that some members felt that it is also important to ensure that at the same time as random testing is being introduced that any lack of community confidence should be recognised and addressed.</p>
	<p>In relation to drug driving, members were keen to see research continue into the development of devices to detect impairing drugs and felt that this should be a top priority. They also felt that the introduction of an offence of driving with illegal drugs in the body may be a useful interim measure until technology aimed at detecting impairing drugs is proven.</p> <p>The Committee recommends that research into the development of devices to detect impairing drugs should be a top priority and that until such technology is available an interim offence of driving with illegal drugs in the body should be introduced.</p>
	<p>Members heard from representatives of the road haulage industry that the road haulage industry already has a significant function in informal self-policing of driving under the influence of drink and drugs. The representatives stated that responsible operators have embraced their duty of care towards their staff and other road users through random breathalysing and drug tests but that smaller operators are perhaps not as aware of the importance of this due to a lack of guidance.</p> <p>The Committee recommends that the Department issues guidance to operators for the introduction and management of drink and drug policies for employees.</p>
	<p>The majority of those that gave evidence to the Committee repeated the view that driver behaviour when using the road is unacceptable and is a major issue with an attitudinal change needed in all road users. The Committee was very impressed by the G.A.A.'s 'Live to Play' campaign which uses high profile players in advertising campaigns, posters and appearances at games.</p> <p>The Committee recommends that the 'Live to Play' campaign is expanded to include other sports and that the Department links up with high profile sports stars to help get the road safety message across to the younger age groups who see sports stars as role models.</p>
	<p>The Committee is also supportive of the education awareness courses being offered by the PSNI as an alternative to a £60 fine and 3 penalty</p>

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	points. This is a good example of the 'carrot' approach in operation and the courses should lead to improved behaviour of those who attend.
	<p>Members also considered research aimed at limiting hand held mobile phone use in vehicles and again recommends that the Department continues to liaise with the Department for Transport to encourage manufacturers to introduce hands free technology into all new cars in the interests of road safety.</p> <p>The Committee recommends that the Department continues to liaise with the Department for Transport to encourage manufacturers to introduce hands free technology into all new cars in the interests of road safety.</p>
Synopsis of the evidence taken by the Environment Committee from organisations on the Road Safety Strategy Consultation	<p>Support for lower drink driving limit and random breath testing (RoSPA)</p> <p>Support for the introduction of an offence of driving with illegal drugs in the body (RoSPA)</p>
	<p>The DOE should recognise commercial fleet operator's role in drink and drug driving compliance enforcement and issue guidance to operators for the management of drink and drug policies. (FTA)</p> <p>Require employers to introduce breathalyser kits to check whether a driver is intoxicated at the time of reporting for work (RHA)</p>
	Attitude change in ALL road users needed (Association of Driving Instructors Association NI)
	Unacceptable behaviour when using the road is a major issue (RCN).
	Motorists behaving in an improper manner (UFU)
	Black box technology has a lot of potential (RoSPA)
	Education awareness courses being offered as alternative to £60 and 3 penalty points (PSNI)
	Support the training of more officers re tachographs to improve enforcement activity (Measure 58) (RHA)
	The Highway Code should include a specific section on sharing the roads with large commercial vehicles which would be testable at both theory and practical driving tests for car drivers and motorcyclists. (FTA)
	Introduction of Graduated Fixed Penalty and Deposit Scheme will help reduce non compliance figures. (RHA)
	<p>With the Coverbox system the customer gets a monthly bill based on how much driving they have done, when they have drove (e.g. peak/off-peak) and where they have drove (e.g. motorways or country roads).</p> <p>Undisclosed modifications and incorrect vehicle details are unlikely as the</p>

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	<p>vehicle receives an inspection before the equipment is installed. This can, as a result, improve road safety. The main target group of this insurance would be young people. It provides them with an incentive to drive safely and carefully and only when they need to, as high insurance premiums will be replaced by "pay as you drive" monthly bills that can be tracked online. The box alerts control room if it has been tampered with or disconnected so insurance fraud is less likely and if car is stolen it can be tracked. Cobra would support a pilot scheme in Northern Ireland, giving new drivers the opportunity to try out this new technology. Cobra believes that awareness needs to be raised about this technology and that it can change the mindset of drivers. (COBRA)</p>