



**DRAFT RESPONSE TO THE DEPARTMENT FOR TRANSPORT'S
CONSULTATION PAPER**

"MONITORING DRINK DRIVING"

4 September 2014

Introduction

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation paper, "Monitoring Drink Driving".

RoSPA thanks the Department for the opportunity to comment on the proposals. Our response has been produced following consultation with RoSPA's National Road Safety Committee. We have also liaised with the Institute of Alcohol Studies.

The Department for Transport has published annual estimates of drink drive accidents and casualties for over 20 years. They are an important part of the road safety evidence base, and enable progress on reducing drink driving to be monitored and the effectiveness of drink drive education, legislation and enforcement to be assessed.

The statistics are derived from a combination of Stats19 data and toxicology data collected from Coroners (and Procurators Fiscal in Scotland). Toxicology data are not available for all killed drivers, either because a toxicology test was not conducted, it was not possible to collect the data from the coroner or because the driver died more than 12 hours after the accident and thus toxicology tests are unlikely to be reliable indicator of alcohol levels at the time of accident.

It takes around 18 months to collect the final toxicology data. Therefore, provisional estimates are published about six months after the end of each year to provide a timely snapshot of drink drive data, and the final figures are published about a year later when more data are available. The provisional estimates are usually based on data from between 30% and 40% of killed drivers. For the final estimates, the blood alcohol level (BAC) is known for around 60% to 70% of killed drivers. This is scaled up to account for the drivers with unknown BAC. This assumes that the drivers with known BAC are representative of the wider population of killed drivers, including those without known BAC.

Another problem is that the sample size on which the figures are based has reduced substantially because the number of drivers killed has more than halved over the last decade, from around 1,900 in 2003 to 920 in 2012. This means that the provisional estimates are now based on a relatively small sample, which increases the uncertainty around the estimate.

For example, the 2012 provisional statistics were based on just 264 toxicology returns with known BAC. The provisional estimate for 2011 was 280 drink drive fatalities, whereas the final figure was 240, 15% lower. The provisional estimate suggested that drink drives deaths had increased from 2010, when in fact the final figures showed they were unchanged, and were the lowest figure (jointly with 2010) since detailed recording began. Similar differences have been seen in previous years.

Therefore, the DfT is seeking views on options for changing the methodology and timing for provisional statistics, and whether they are necessary at all.

C1 What use do you make of the provisional and final drink driving estimates at present?

RoSPA Response

RoSPA uses both the provisional and final estimates of drink drive deaths and casualties to raise awareness of the level and consequences of drink driving, and of ways in which drink drive accidents and casualties can be avoided. We use the figures to inform RoSPA's road safety policies and priorities, as well as our education and information resources. We also use the data to inform, and prioritise, the measures on which we campaign or lobby, such as reducing the drink drive limit.

RoSPA quotes the figures in a wide range of written resources (e.g. policy papers, advice guides, education resources and factsheets), in media statements, press releases and interviews, and in our various social media channels.

RoSPA communicates the drink drive figures, and our views and advice based on the figures, to a wide range of audiences, including the public, employers, central and local government, stakeholder organisations, and the media.

C.2 Which, if any, of the proposed options below do you think is the best future form for the provisional estimates and why?

Option 0

Retain provisional statistics with their current form and timing

Option 1

Stop publishing provisional statistics entirely

Option 2

Delay provisional statistics to later in the year to allow a larger, more representative sample to be gathered

Option 3

Adjust the estimates to account for the bias

Option 4

Produce the estimate as a range, rather than a single "best" estimate

The options are not mutually exclusive – for example, option 2 (delaying to later in the year) could be combined with 3 or 4.

RoSPA Response

As the DfT note in the consultation paper, these options are not mutually exclusive. RoSPA's preferred option would be a combination of options 3 and 4, which we believe would help to address the problem of the provisional figures tending to over-estimate drink drive casualty figures, but without sacrificing the timeliness of the provisional estimates.

RoSPA does not support option 0, to retain the provisional statistics in their current format and timing. It is extremely important, for all concerned, that the figures are accurate and reliable. We agree with the DfT that the reducing sample size, and systematic bias in the data, makes the provisional estimates less reliable than they used to be. Persistent and significant differences between the provisional and final figures make it harder to understand and interpret the data, and to devise and communicate trends and advice based on the data. It also threatens the credibility of the data.

However, we also believe that waiting for 18 months for the final estimates is too long. The publication of interim figures remains essential for tracking the progress of drink driving policies, and for responding swiftly to any drastic increases in the number of drink driving deaths with suitable recommendations.

RoSPA would strongly oppose option 1, to stop publishing the figures entirely, because they provide essential data, and enable and encourage organisations, such as RoSPA, to raise awareness of the dangers and consequences of drink driving and how they can be avoided.

C.3 If option 2 is your preferred option, when in the year do you think the provisional estimates should be published?

RoSPA Response

RoSPA does not support option 2, to delay the publication of the provisional estimates until later in the year. The DfT's analysis in the consultation paper indicates that there is no obvious publication timescale between the current 6 months and the final figures at 18 months.

As the consultation paper states, "*delaying the estimates to later in the year would confer some improvement in accuracy and precision, but would not eliminate systematic bias entirely. A delay would also reduce the timeliness of the data.*"

The figures would still be provisional, and, therefore, not as accurate as the final estimates (which themselves are based on toxicology data for 60% to 70% of drink drive deaths). Delaying publication would not solve the accuracy problem, but it would hinder the timely promotion of drink drive education and the development of drink drive research and policy.

C.4 If option 3 is your preferred option, do you have any suggestions for an improved adjustment methodology?

RoSPA Response

Option 3 on its own is not RoSPA's preferred option, but we do believe that it should be combined with option 4. Using the data from the previous years' final estimates would reduce the likelihood of provisional estimates consistently over-estimating drink drive deaths, but appears to still result in consistent over-estimates, which need to be revised (usually, but not always, downwards) in the final figures.

C.5 If option 4 is your preferred option, do you have any other suggestions on how to construct a sensible range?

RoSPA Response

Option 4 its own is not RoSPA's preferred option, but we do believe that it should be combined with option 3. Having an upper and lower limit (to a confidence level of 95%) for drink drive deaths (e.g., 240 to 320) would emphasise that the provisional figures are provisional and subject to change when the final figures are published. However, as the range is quite wide, it will remain difficult to assess year on year changes. A central, best estimate figure should also be published with the upper and lower range.

C.6 Do you have any views on hybrid options, combining aspects of options 2, 3 or 4

RoSPA Response

As discussed above, RoSPA's preferred option is a combination of option 3 and 4.

C.7 Do you have any other suggestions on improved methodologies for the provisional estimates?

RoSPA Response

RoSPA is aware of, and would support, a suggestion made by the Institute for Alcohol Studies to publish drink drive casualty estimates at 6, 12 and 18 months after the end of each year. This would allow the data to be easily and regularly tracked and reduce the risk of large differences between the initial provisional estimates (at 6 months) and the final estimate (at 18 months) By staging the estimates in an evenly spaced manner, the data becomes easier to plot statistically.

The disadvantage is, of course, that it would increase costs.

C.8 Do you have any other comments or feedback?

RoSPA Response

RoSPA recommends that further investigations are conducted into the causes of the long delays in obtaining data for the final figures, and for only being able to obtain data for 60% to 70% of cases, to identify any ways in which the data collection can be improved.

RoSPA thanks the Department for Transport for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

Road Safety Department
RoSPA
28 Calthorpe Road
Birmingham B15 1RP
www.rospace.com