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**Mª Teresa SANZ VILLEGAS  
European Commission**Directorate-General for transport and Mobility  
Road Safety  
DM28 04/94  
B-1049 Brussels/Belgium

29th June 2012

Dear Maria-Teresa,

**EU PUBLIC CONSULTATION ON INJURIES**

Following our discussions on 20th June in Brussels, please find below the response from the TISPOL Organisation.

TISPOL – The European Traffic Police Network has a membership of 29 European countries, which includes the 27 EU Member States as well as Norway and Switzerland. Our priority is the reduction in the number of people killed and seriously injured on Europe’s roads. We share good practice and exchange ideas, which improve enforcement of road traffic legislation. We support the ‘healthy mix’ of education and enforcement working together.

The use of accurate statistics is vital as we seek to work together in order to achieve the EU Objective of a 50% reduction in the number of people killed on Europe’s roads by 2020. We have seen the very effective use of statistics recently, when Siim Kallas, the EU Transport Commissioner issued his ‘wake-up’ call following the slow down in the reduction of road fatalities during 2011.

These statistics allow the performance in various countries to be monitored as well as comparing performance with other countries. The statistics also allow the public to hold our politicians, police and other road safety stakeholders to account for the performance and actions being taken in countries.

Accurate statistics allow road safety stakeholders to actively ‘target’ particular areas where there is a high occurrence of road crashes resulting in death and serious injuries. They allow proper analysis of the problem so that resources can be allocated to these areas, whether that is infrastructure or enforcement etc. They also allow the police to effectively ‘target’ their resources to the areas of greatest need – so that the police can deploy resources to the right locations at the right times to deal with the right offences – such as drink driving at 0130 on a Saturday morning. At a time of financial constraint in many countries, this allows the police to maximize the use of their resources.

In respect of fatalities, we have an agreed definition and are therefore able to compare ‘like with like’ in respect of performance across the EU. However, for serious injuries, there is no common definition. TISPOL would strongly urge the European Commission to establish an agreed definition for serious injury.

When it comes to the debate as to what constitutes a serious injury, TISPOL is of the view that it is not for the police to make this decision. The definition needs to be agreed at EU level so that it is harmonised across all EU countries.

There must be sufficient clarity to ensure that we are comparing ‘like with like’ in respect of serious injuries.

Having agreed the definition of serious injuries, who should determine whether an injury in a road crash is serious or not? There have been several suggestions as to how this should be done. Some would suggest leaving it to the police alone, others for the hospital to determine or perhaps a mix of the two options. At present, quite often the analyst and the investigating police officer can become involved in discussion to determine whether an injury should be classed as serious – this is not a satisfactory situation.

TISPOL is of the view that it is for the hospital to determine if it is a serious injury and the experts should make that decision. If someone has sustained an injury, which should be classed as a serious injury, they will be admitted to hospital in any case.

Some may argue that there are problems with the hospital making the determination such as patient confidentiality, matching the patient to the victim at the crash scene and increasing demands on the Health Service.

Despite the arguments, we need to find an effective solution, which should not be a complex solution. A simple solution where accepted documentation is used by the hospital and issued promptly to the police would suffice.

Having found the solution, the road safety community must maximize the use of this data. The European Commission will have to keep oversight of performance in all countries across the EU and call countries to account, where necessary.

At a time of financial constraint across Europe, we are seeing road safety education budgets being cut, police budgets being cut and infrastructure budgets being cut which will have an adverse impact on the overall road safety situation.

For TISPOL, we are determined and we will work hard to support the European Commission in the aim to achieve the 2020 target. We must always remember that we are not talking about statistics; we are talking about lives being lost on Europe’s roads and in this particular consultation, we are talking about people whose lives have been changed – often forever – as the result of a road crash – those who sustain serious injuries.

I hope this is helpful and if you require any further information, please do not hesitate to contact me.

Yours sincerely,

Ian Hamill

General Secretary

TISPOL Organisation