

**DECISION LETTER FOLLOWING CONSULTATION
AMENDMENT OF THE SPEED LIMIT EXEMPTION REGULATIONS THROUGH
THE IMPLEMENTATION OF SECTION 19 OF
THE ROAD SAFETY ACT 2006.**

1. On 27 November 2012 the Department for Transport launched a consultation about proposals to implement section 19 of the Road Safety Act 2006. Section 19 would replace section 87 of the Road Traffic regulation Act (1984) in relation to exemptions from speed limits for certain vehicle purposes.
2. The proposed change would have two major effects. Firstly it will allow certain other vehicle purposes to be included in the speed limit exemption regulations. Secondly it will prescribe a high speed training course that drivers must undertake before they are legally permitted to exceed speed limits.
3. The speed limit exemption consultation asked questions about four main issues:
 - the possible extension of speed limit exemptions
 - the introduction of a mandatory speed limit exemption driver training course and options for how this would be regulated.
 - possible changes to other exemptions from road traffic law
 - the proposal to create an additional exemption to the seat belt wearing law relating to the emergency treatment of patients in ambulances
4. The consultation period ended on 27 February 2013 and a total of 88 responses were received:

Ambulance Service/Associations (Public and Private Sector)	15
Fire & Rescue Services	9
Police/Police Associations	6
Interested Organisations/Groups	27
Members of the Public	31
TOTAL	88

5. The Department is grateful for all of the comments received. Most of the respondents did not provide answers to each of the 21 questions posed. However all comments that were received have been carefully considered and a summary of responses to each of these questions are given in paragraph 6 to 131 below. A list of the organisations who responded is included at Annex C.

EXTENDING SPEED LIMIT EXEMPTIONS TO OTHER VEHICLE PURPOSES

6. **Question 1:** Do you agree that in principle Section 19 of the Road Safety Act (2006) should be implemented? If so, when should it be implemented?

7. This proposal received strong support across all of the groups. Of the 71 that responded 66 (93%) agreed that section 19 should be implemented. The strongest support came from the Police Service who gave their full backing to this proposal. Most of those that commented agreed that emergency response drivers must be appropriately trained for what can be extremely demanding circumstances. It therefore made sense to regulate and prescribe high speed training to those who can demonstrate a need to be exempt from speed limits.
8. The Association of Chief Police Officers (ACPO) supported the proposal but raised concern that since Section 19 (S19) was first proposed the financial landscape had changed for all of the emergency services. They felt that the ongoing restructuring and changes to Police driver training provision could make S19 more challenging to implement. ACPO suggested that a delay in the commencement of the regulation would ensure that operational response to emergencies is not compromised.
9. The Police Federation of England and Wales shared similar views commenting that they had not yet assessed their forces to determine how speedily their driver training programme could meet the requirements under the proposals. The Federation highlighted the need for ensuring that either good communication is made to the emergency services in advance of any enactment or that there is a phased approach with sufficient urgency to get officers accredited to the new standards within a set timeframe. This would ensure that there is no impact on their force's ability to respond to incidents.
10. The Police Superintendents' Association of England and Wales gave their support to S19 but questioned whether the Emergency Services needed legislation to adopt a process of accreditation to demonstrate driving competence. They commented that other areas of the business such as Firearms and Public order command had successfully adopted accreditation without legislation.
11. The Fire and Rescue Services (FRS) gave their full support to this proposal agreeing that any further delay to the introduction of S19 will affect the momentum within the FRS in planning for the prescribed driving standards. They point out that, despite previous delays, the ground work has been completed in establishing a common approach to training and this has been adopted by much of the service. Any further delay may result in the good work, to improve road safety standards, being lost.

12. The Chief Fire Officers' Association (CFOA) added that S19 would provide appropriate regulation to those using blue lights and exercising their right to exceed the speed limit. They also believed that regulation and standardisation will be essential as there is likely to be an increase in the number of non-statutory users in the future.
13. Some Fire and Rescue Services commented that section 19 should only be implemented when a full quality assurance system is in place to regulate the training establishments and providers that are not currently covered by the speed limit exemption regulations. This should also be available to existing exemption holders if required.
14. Most of the Ambulance Service and Associations agreed with proposals to implement section 19. The main comments were about the importance of training and allowing time to ensure that appropriate arrangements are in place. In addition the following comments were made:
 - The Association of Ambulance Chief Executives and the Scottish Ambulance Service both felt that S19 would provide a legal framework for the emergency services to continue to develop and deliver their driver training programmes. It will also ensure that any other exempt organisation, whether it is as a responder or training supplier, will be subject to the same standard and quality assurance validation of the statutory emergency services.
 - The Northern Ireland Ambulance Service added that S19 will legalise claims of speed limit exemption during driver training. The inclusion of other vehicle purposes within the legislation would also assist the ambulance service in the provision of healthcare to patients
 - St John's Ambulance believed that implementation should occur after driving courses have been submitted to the DSA and approval is either granted or declined for being compliant with the competencies and standards set.
15. The introduction of mandatory driver training was seen as an important measure for improving road safety by most of the interested organisations supporting section 19.
16. The Royal Society for the Prevention of Accidents (ROSPA) agreed with this view. They believed that section 19 should be implemented as soon as practicable, subject to the results of the consultation, the availability of suitable training courses and a robust accreditation and quality assurance scheme.
17. South Yorkshire Safer Roads Partnership and the Institute of Advanced Motorists (IAM) commented on the need to balance the road safety aspects of excessive speeds with the general public interest of saving life and preventing injury. They believed that enhanced appropriate training and regular

assessment backed by regulation was needed to mitigate the increased risk of road traffic collision.

18. Most of the private individuals who supported section 19 felt that, subject to driver training, any organisation involved in protecting life and limb or national security should be allowed to exceed speed limits for operational purposes. Some expressed surprise that the proposed list of additional purposes were not already permitted to exceed the speed limit. However, it was also suggested that penalties should be strictly enforced to prevent organisations from abusing the privilege of using exemptions.
19. Only 5 responses (7%) disagreed with section 19, the following comments were made:
 - This legislation is counter productive and a severe risk to the public (Over and above that of the risk/chance of an accident caused by these drivers). Emergency services budgets are already stretched, yet this legislation will force many emergency service workers to respond within the speed limit because they can't get the required training. This will lead to an increase in response times leading to increased waiting time/deaths.
 - The inclusion of several of the proposed additional purposes can be addressed directly by clarifying the existing legislation without the need to bring Section 19 of the Road Safety Act (2006) into effect.
 - Brake recommended that the government halts its plans to extend speed limit exemptions to a wider range of drivers; until and unless it can demonstrate that the benefits to public safety outweigh the costs. Brake is deeply concerned that the government is proposing a measure that could lead to more devastating and costly casualties, particularly among people on foot and bicycle, without having carried out a proper assessment of the safety implications. The consultation document makes an implicit assumption that this proposal will carry a benefit to the public, without setting out any evidence basis for this, while ignoring the very real potential for more deaths and injuries caused by more drivers being permitted to drive at high speeds.
20. **Question 2:** Do you agree with the criteria the Department proposes to use to consider whether to add additional purposes for speed limit exemptions?
21. Of the 50 responses to this question 43 (86%) agreed with the proposed eligibility criteria. The following comments were made in support of the criteria:
22. The Police Service agreed that the criteria should be clearly laid out to ensure a fair and transparent process of assessment. However most of those that commented suggested that the proposed criteria should be more prescriptive rather than just giving areas for comment.
23. The Police Superintendents' Association of England and Wales felt that the criteria had little emphasis on the expectation around the Command and Control functions. This includes communications that would be expected

to be in place and how procedures would be monitored and quality assured. When assessing the business cases they stressed the importance of weighing the necessity test and command and control functions to ensure the potential benefits of the exemption outweigh the potential risks to the public. This view was supported by other police services.

24. The Police Federation of England and Wales also raised the subject of operational need commenting that this issue should be carefully considered before adding more services to the legal exemption from speed limits. A key question must be to ask how urgent is the emergency or operational incident being responded to that requires other groups to have a legal exemption?
25. There was very strong support for the proposed criteria from the Fire and Rescue Services. The Chief Fire Officers Association also supported the proposal to use the Emergency Services' High Speed Driver Training Group to provide advice on applications. They felt that this would make good use of the Group's experience, skills and knowledge.
26. Greater Manchester FRS agreed that the requirement to protect lives and public property should form part of the eligibility criteria and added that the application process should be subject to rigorous scrutiny. This includes publishing a list of organisations that are permitted to exceed the speed limit along with justification as to why and how that organisation passed the scrutiny process.
27. Most of the Ambulance Service and Associations agreed with the proposed criteria. Strathclyde Ambulance Service highlighted the area of public safety commenting that speed limit exemption should have a direct link to life or limb situations. Northern Ireland Ambulance Service also added that guidance should be sought from the appropriate emergency service pertaining to applicant's suitability.
28. Amongst the other stakeholders there was general agreement that the proposed procedure and criteria would provide a robust assessment framework. In addition the following comments were made:
 - The Royal Society for the Prevention of Accidents felt that care should be taken to ensure that there is not an enormous growth in the number of vehicles purposes given speed limit exemptions. Exemption should only be granted where it would significantly reduce the threat to public safety, and not just to help organisations improve their operational performance.
 - The Ministry of Defence (MOD) suggested that some consideration should be given to specifying the occasions when speed limits can be exceeded. For example when undertaking duties relating to a national security emergency or when undertaking training in support of such activity. MOD believes that this clarification may help to ensure that there is proper use of such exemptions.

- Transport for London shared similar views commenting that applicants should also be required to set out their process for agreeing when to use the speed exemption and when not to. They also suggested that drivers must be able to demonstrate that their use of the exemption is required in each case and written evidence of this must be logged before each journey commences.
29. Only 6% of those that responded to the question disagreed with the proposed criteria. The main reason given by those that commented was that the criteria's definitions were either not clear enough or needed to be broader. In addition the following comments were made:
- The criteria are unnecessarily bureaucratic and set too high to allow for the sensible extension of exemptions to users acting in the public interest. In addition, factors such as maintenance procedures of vehicles are introducing an unnecessary cost burden on new providers, which does not apply to existing providers.
 - Another stakeholder had mixed views about the proposed criteria expressing concern that the phrase 'national security' is poorly defined and that some of the current uses may not be an 'emergency'.
30. 43% of respondents did not answer the question.
31. **Question 3:** Should the additional purposes for speed limit exemptions be largely confined to some of the organisations and purposes currently allowed to fit and use blue lights?
32. Of the 48 responses to this question 34 (71%) agreed with the proposal. The strongest support came from the Ambulance service (100% of those that responded agreed).
33. Most of the stakeholders who commented agreed that speed limit exemptions should largely be confined to blue light vehicles but did not believe that this should exclude other suitable applicants with sound and justifiable business cases.
34. The Association of Ambulance Chief Executives and the Scottish Ambulance Service suggested that other agencies, providing a response on behalf of a currently exempt organisation, should be included subject to them meeting the codes of practice standards. This could include hospital trauma teams, British Association for Immediate Care (BASICS), GPs and emergency retrieval teams who respond on behalf of NHS Ambulance Services.
35. Other stakeholders agreed with the proposal but raised concern that the definition of some blue light vehicles was unnecessarily restrictive. Independent lifeboat charity, GARFIS, commented that 'Royal National Lifeboat Institution' excludes the independent lifeboats that are declared Search & Rescue facilities to HM Coastguard. Whilst Mountain Rescue were concerned that the British Cave Rescue Council (BCRC) were overlooked when 'Mountain

Rescue' was added to the blue light list, even though they are doing similar work albeit underground rather than above.

36. The Royal Society for the Prevention of Accidents agreed in principle with the proposal but did not think that being allowed to fit and use blue lights should automatically result in speed limit exemption. The Police Service expressed similar views believing that each case should be considered individually. The crucial aspect is does the vehicle 'need' to use blue lights to fulfil its function and if it does what necessitates speed limit exemption?
37. Durham and Darlington (FRS) added that only vehicles that are clearly identifiable for the particular purpose and correctly adapted, should be included, not private users vehicles which are used to reach the appropriate emergency vehicle.
38. 27% of those that responded to the question disagreed with the proposal. The Police Federation of England and Wales acknowledged that other properly recognised emergency responders may need to use blue lights; but this does not mean that there is also a need for speed limit exemption. Blue lights can be used for many operational reasons, for example to alert the public to the presence of emergency vehicles, to negotiate through heavy traffic or as a marker at the scene of a recognised emergency incident.
39. The Fire and Rescue Services held similar views adding that exemptions should only be extended to organisations, fulfilling the need to protect life or property subject to them passing the application process and meeting training requirements. Most of the stakeholders that commented supported these views. Other comments included:
 - Association of Chief Police Officers in Scotland (ACPOS) raised the issue of agencies like HM Customs and Excise and the Security Services that are not on the list of blue light vehicles but may merit inclusion in the exemption. ACPOS stressed that careful consideration must therefore be given to the operational necessity for potential cases and they must be judged on their own merits. Public safety must be the main concern.
 - Ministry of Defence suggested that there should be a review of the requirement to fit and operate under blue light conditions where the use of high speed is considered necessary.
 - Training organisations raised the issue of commercial organisations who deliver training commenting that they will need to claim exemption under Section 19 to enable the internal quality assurance and development of their trainers and to provide training to individuals.
40. 45% did not answer the question.
41. **Question 4:** Do you wish to nominate a specific purpose as one that should be granted an exemption from speed limits? If so is there any evidence related to any specific purposes you would like us to be aware?

42. 47% of respondents nominated one or more vehicle purposes which they believed should be included in the speed limit exemption regulations. Overall, vehicles used for transporting human tissue for transplant purposes received the most support across all of the stakeholder groups. Those that commented agreed that exemption should be allowed for instances where life can be prolonged by the prompt delivery of human tissue.
43. Some stakeholders also suggested that the legislation should recognise the transportation of the medical retrieval teams who travel from their home base to retrieve donor organs for recipient centres and the transport of medical teams between hospitals. This would include doctors, nurses or an expert surgeon brought in to attend to a patient with a life threatening condition.
44. The following three groups received the second most nominations.
- Community First Responders (CFR) received strongest support from private individuals who commented on their importance particularly in rural areas. CFR are used by the Ambulance service to attend serious medical emergencies and are sent to places where the ambulance cannot get to the patient within 7 minutes. CFR are able to cover more areas or arrive at the emergency quicker in rural areas where ambulance cover is low or non-existent.
 - Civil Aviation Authority airport fire service (CAA) - The CAA airport fire services were omitted from the new definition of fire service authorities following the enactment of the Fire and Rescue Services Act 2004. Those that commented in support of CAA agreed that their airport fire services are an essential part of a response to emergencies, both on and off an airport site.
 - Doctors on call had support from private individuals and the Metropolitan Police (subject to them completing a driver training course). Stakeholders commented that on-call doctors often respond to a range of accidents or to an emergency at a hospital and are required to reach trauma centres within 30 minutes of the call. The British Association for Immediate Care (BASIC) held similar views adding that registered medical practitioners supporting an emergency response should be clearly recognised in the regulations as acting for Police, Fire or Ambulance purposes if they are mobilised by that service.
45. **Question 5:** Are there any vehicle purposes (including those listed) which you consider are unsuitable for a speed limit exemption?
46. Everyone that responded to this question felt that some or all of the proposed list of additional vehicle purposes were suitable for speed limit exemption. However 22 out of the 52 that responded (42%) felt that at least one of the purposes listed was unsuitable. Of these 33% named Her Majesty's Revenue and Customs (HMRC) covert surveillance vehicles and 30% Forestry Commission fire fighting purposes.

47. Most of the stakeholders that disagreed with the inclusion of HMRC covert surveillance vehicles were not convinced that their activities required an emergency response. They argued that generally lives were not in immediate danger and in instances where they were the police can and could assist if required.
48. Others were concerned that these vehicles will not be using blue lights and warning sirens. They commented that unmarked vehicles would put public safety at risk and that there are already too many road traffic collisions taking place with marked police vehicles using blue lights and sirens. The need for exemption must therefore be balanced against the risks associated with the response.
49. The stakeholders that raised concern about the Forestry Commission felt that the reasons given for their inclusion had not been made clear. They suggested that the purpose for which any newly exempt vehicle is to be used should be qualified in law. Generally most stakeholders agreed that suitability is not really the question; organisations must be able to demonstrate and justify their need to be exempt.
50. Overall, respondents expressed strong opinions about whether section 19 should be implemented or not and why. However, when it came to the detail of how this should be done, most members of the public chose not to comment (84% did not answer Q2 and Q3).

MANDATORY SPEED LIMIT EXEMPTIONS DRIVER TRAINING COURSE

51. **Question 6:** Should the Code of Practice produced by the Speed Limit Exemption Driver Training Steering Group in 2008 be the basis of a statutory Code of Practice?
52. Of the 52 responses to this question 49 (94%) agreed that the statutory code of practice should be based on the one developed by the Steering Group. Most of the stakeholders that commented agreed that the code would help to improve consistency of training standards across the service and ensure that there is proper accountability. Others felt that the document should be used as it is well-researched and incorporates the experience and knowledge of a range of people and organisations that are currently exempt from speed limits.
53. The Royal Society for the Prevention of Accidents (ROSPA) commented that it was unlikely that spending further time and resources on developing a separate statutory Code of Practice would be cost-effective or produce a better result.
54. Some stakeholders expressed mixed views about using the code raising concern that some aspects of it may be out of date. Although they agreed that the document should be used as a 'starting' point for the statutory code they believed that it should be reviewed and procedures amended accordingly before implementation.

55. The Independent Ambulance Association agreed that a statutory code should be introduced, but that there should be a further period of consultation with a wider range of stakeholders prior to implementation.
56. Only 1 respondent disagreed with the proposal commenting that the code produced by the Steering Group only covers speed limit exemption and not the additional exemptions from road traffic law that are proposed.
57. **Question 7:** Do you have any comments on the details of the Code of Practice?
58. Of the 53 responses to this question, only 39 (74%) chose to provide comments on the code of practice. Most stakeholders strongly supported the introduction of a prescribed high speed training course but there were mixed views about 5 year re-assessments. Strathclyde Ambulance Service commented that this requirement would be unnecessary for drivers that have completed a satisfactory training course and are already subject to refresher training through their employer. They believe that 5 year assessments would simply be a costly exercise with no real gain to the private sector organisations affected.
59. However Oxfordshire & Buckinghamshire FRS thought that the 5 years gap between re assessment may be too long to maintain driver competence. They suggested that the time period should be based on the number of times a driver exceeds the speed limit. BASIC held similar views commenting that flexibility is needed within the code of practice so that courses can be tailored to meet the need of the organisation.
60. Other comments included:-
- The Independent Ambulance Association raised concern about the recommendation that training bodies must have a minimum of three instructors believing that this could potentially exclude smaller training organisations. They suggested that a training body could consist of a single instructor with an external assessment undertaken by another organisation, the 'cross check' is not an essential part of the standards.
 - BRAKE felt that training requirements should have a strong focus on risk awareness. The priority must always be on minimising risk to the public and emphasising that exceeding speed limits is a high-risk activity undertaken as a last resort. Brake also suggested that ACPO's guidance on exceeding speed limits could be used to help prevent road death and injury. They believed that a statutory code should be in place for all emergency vehicles created in partnership with emergency services.
 - Transport for London shared similar views adding that training should also cover legal issues such as risk ownership so that trained drivers are fully aware of the consequences of any collisions that occur whilst using the exemption.

- Ministry of Defence and the Institute of Advanced Motorists (IAM) both felt that as the Code was developed in 2008 it would need to be reviewed before implementation to ensure that it is still fit for purpose.
- ROSPA raised concern that the Code was written before out-sourcing in the emergency services had become common. The commercial pressures of competing partly on price could create a risk that some organisations may not fully implement all aspects of the Code of Practice. To overcome this, a robust quality assurance regime is needed to ensure that the learning outcomes set out in the code of practice are being achieved.
- Other stakeholder organisations felt that the code should include training for all of the additional exemptions which are being considered not just driving at high speed. A significant number of collisions involving emergency vehicles take place within the speed limit. They therefore believed that the ability to negotiate obstacles such as traffic congestion, red lights and junctions was as important as driving safely above the speed limit.
- The Association of Industrial Road Safety Officers support this view adding that the code should be re-named to divorce the concept of High Speed Driving and the connotations which it gives, particularly as we are seeking to deliver safer practices.
- Private individuals who commented felt that references to pedestrians and cyclists should be given greater prominence in the code. Training must be much more heavily weighted to covering the areas of genuine risk.

61. 40% of respondents did not answer the question.

62. **Question 8:** Should the frequency of training and transitional arrangements be included specifically in the regulations or not?

63. Of the 52 responses to this question 46 (88%) agreed with this proposal. Most of the stakeholders that commented felt that it would improve driver training standards and ensure that there is common practice across the different groups. It would also give the public confidence that there is a desire to continue the work of emergency services in reducing the risks associated with emergency response.

64. The Police Federation England & Wales commented that the frequency of training and transitional arrangements should be addressed in either the Regulations, or at the very least in the proposed codes of practice. This would help to ensure compliance and accountability as well as clarifying what training is acceptable and to what standard.

65. Essex County Council expressed similar views agreeing that the proposal would ensure that the whole process is robust, transparent and accountable in the event of a collision.

66. BASIC added their support to the requirement for a 5 yearly reassessment of competence, but suggested that it should be made clear that this does not mean undertaking the full training. The appropriate remedial training should be required for those where reassessment proves unsatisfactory.
67. However, some stakeholders expressed reservations about the proposal. The main comments were:
- Strathclyde Ambulance Service raised the issue of 'grandfather rights' and the assumption that only drivers that are currently exempt have completed courses of advanced and high speed training. They point out that there are many others within this sector who have documentary evidence to prove they have the necessary qualifications to meet the requirements as laid out in the Code; sometimes at a high personal financial cost for those operating within the private sector.
 - ACPO supported the idea of 'grandfather rights' but requested that this also includes a reference to 'or reassessment' within five years; without this the effect may cause unintended operational difficulties for the services.
 - MOD suggested that the Code should only be an outline of training arrangements, such as the maximum timeframes prior to reassessment. They believe that it should be the responsibility of each service to determine how it will meet these arrangements including shortening the timeframes or increasing the number of assessments within the set periods if they wished.
 - Other stakeholders shared similar views agreeing that the requirement for a 5-yearly refresher/ assessment programme may be too long for some organisations that rarely drive in emergency situations. They suggest that any programme of continuing development should have options that might be appropriate for each organisation's need. A one week course every five years may be appropriate for some but one day a year might be better for others.
68. 8% of those that responded to this question disagreed with the proposal commenting that it would not allow flexibility. For example, short periods of instruction combined with shorter and/or less frequent formal refresher training. This would be of benefit to the voluntary sector as well as allowing for training in conditions which do not arise regularly such as fog, snow etc. Most respondents suggested that the frequency of training should be included in the Code of Practice enabling any amendments to be carried out in a more flexible way than a legislative approach.
69. Overall 41% of respondents did not answer the question.
70. **Question 9:** Do you agree with the proposal to require accreditation by the Secretary of State for some of the Speed Limit Exemption Driver Training, with the exceptions set out in the consultation document?
71. Of the 49 responses to this question 44 (90%) agreed with this proposal. The main reason given was that the accreditation process would ensure that there

are consistent training standards and that the quality of delivery is maintained. However, some stakeholders also expressed reservations about the Driving Standards Agency's ability to regulate the process commenting that they may not have experience of providing training at excessive speed.

72. Roadskillplus commented that it is critical that the accrediting body and or its verifiers have practical experience in operational emergency response driving. If the trainers need to evidence this experience, so too should the verifiers. This view was supported by other respondents.
73. ROSPA agreed with the proposal but suggested that the DSA accreditation scheme should include courses and course instructors that the current emergency services have brought in from other organisations (out-sourced).
74. 8% of those that responded to this question disagreed with the proposal. Most of those that commented supported the introduction of the accreditation process but felt that this should apply to the training of all bodies, including those of the current emergency services. This would ensure that all providers were subject to the same training environment and cost base.
75. Overall 44% of respondents did not answer the question.
76. **Question 10:** Do you agree with not setting maximum fees for courses?
77. Of the 45 responses to this question 37 (82%) agreed that maximum fees should not be set for training courses. The main reason given was that there should be sufficient competition in the market place to render a cap unnecessary.
78. Other comments in support of this proposal included:-
 - Association of Ambulance Chief Executives suggested that organisations with differing operational needs will provide courses of different duration, to meet the scope of practice standards, including additional elements not directly related to high speed driving. It would be impractical to legislate regarding the economics of course delivery.
 - Scottish Ambulance shared similar views but added that there may be some rationale for setting a minimum charge to ensure that cost cutting (for competitive advantage) does not result in reduced standards or increase risks to the public.
 - Institute of Advanced Motorists commented that organisations should have the option, if they wished to pay highly for a specific quality of training or for it to be delivered in a specific way which may raises costs.
 - British Red Cross agreed that maximum fees should not be set but suggested that a further review should be considered if prices become disproportionate and "sufficient competition" does not self-regulate fee levels.

- London Fire Brigade held mixed views indicating a preference for an annual review on the level of fees set by the DSA. This would limit the opportunity for private training providers to exploit a captive market in the event of training being further outsourced to third party providers.
 - Mountain Rescue and the British Cave Rescue Councils agreed with the proposal but suggested that there should be guidance on fees.
79. 15% of those that responded to this question disagreed with the proposal. The following comments were made:
- Strathclyde Ambulance raised the issue of training paid for privately suggesting that this should be capped at a reasonable level to ensure that it is within the financial reach of all firms/individuals. Otherwise they feared that some smaller firms will either cease trading, or more likely will simply ignore the fact that drivers need to be trained. This could lead to areas of the country being left without cover.
 - Oxfordshire & Buckinghamshire FRS commented that training provider fees should be regulated if not it would become too expensive to buy in training. The Public Sector would then be excluded from using external suppliers on cost grounds within the current round of spending caps.
 - Other stakeholders commented that currently price cutting is common amongst private Driving Instructors but 'cheap' is not always best. They raise concern that although the best training providers may be the most expensive, many will opt for something cheaper due to financial pressures.
80. Overall 49% of respondents did not answer the question.
81. **Question 11:** Do you agree with the proposal about the Driving Standards Agency's (DSA) fees?
82. DSA have estimated that their fees are likely to be around £881 for initial accreditation with an additional fee being charged for quality assurance visits. Of the 46 responses to this proposal 31 (67%) agreed but commented that there should be more transparency about how the DSA's costs were derived and what they are charging for. The Northern Ireland Ambulance Service suggested that recurring costs should also be itemised, this would include re-accreditation visits and potential re-registration costs.
83. The Independent Ambulance Association supported regulating the maximum fee that DSA can charge for accreditation. They felt that this will help ensure that the maximum number of training providers is able to enter the market, improving competition and cost efficiency for those seeking training.
84. St John Cymru had mixed views about the proposal. Although they agreed that the initial accreditation fee seemed reasonable, they raised concern that the ongoing annual fee had not been stated and could escalate. Any costs

here will be absorbed by the training providers which will mean increases in driver training costs.

85. 30% of those that responded to this question disagreed with the proposal about DSA fees. The main reason given was that there was insufficient information about how their costs were calculated and what organisations can expect to get for their money.
86. The London Fire Brigade requested further clarification of the proposed fees; in particular the £881 initial accreditation fee and the quality assurance visit fees. Most of those stakeholders who commented expressed similar views.
87. Other stakeholders raised concern that the fees would make it very difficult for some voluntary groups such as BASICS and mountain rescue to afford to operate training.
88. Some private training providers questioned whether the Police, Fire and Ambulance Services' exemption from this proposal will prevent them from delivering training in the commercial market.
89. Overall 48% of respondents did not answer the question.
90. **Question 12:** Should there be a regulated statutory database listing trained drivers, other than those in police, fire and rescue authorities, NHS ambulance service, SOCA and the military/security services?
91. Of the 46 responses to this question 37 (80%) agreed with this proposal. London Fire Brigade added that organisations should also be required to maintain training records for the drivers they employ that are permitted to utilise the speed limit exemption. Most of those that commented shared this view.
92. Other comments in support of the proposal included:
 - The Police Federation of England and Wales believed that the database was a necessary requirement to enable the system to be policed and monitored. Most of the Police Service supported this view agreeing that the database was needed to enforce the regulations and allow officers to check the status of driver in circumstances of a potential prosecution for excess speed.
 - The Institute of Advanced Motorists added that the database should ideally be available to the police "online" so that officers are able to immediately clarify whether an individual is qualified to use the exemption. .
 - The Independent Ambulance Association commented that the database would make it easier for private and voluntary sector organisations to obtain proof of driving qualifications when employing former or current employees of the statutory services. It would also reduce the unnecessary cost burden of undertaking retraining of staff that do not require it.

- Private training providers and Organisations supported this view but added that any responsible organisation should also carry out an independent assessment of a driver's skills to judge if they can meet the standard set by their organisation.
 - Several stakeholders also suggested that there should be an additional category on individual's driving licences to show that they are trained drivers. This could be issued through the DSA.
 - The Civil Aviation Authority (CAA) agreed with the proposal but did not think it was necessary for aerodrome rescue and fire fighting services to be included on the database. They pointed out that the CAA already requires records to be kept and monitored. In addition the European Aviation Safety Agency require records of driver competence on airports to be maintained, so for aviation this requirement would be duplication and could be contradictory. London Heathrow Airports supports this view.
93. However some stakeholders commented that it was unfair to include some driver trainers and not others. The Association of Industrial Road Safety Officers supported this view commenting that all emergency response drivers including, Police, Fire, Ambulance, SOCA and Military should be included in the database. They added that for consistency a universal database would be a more transparent and reliable system and ensure standardisation.
94. 13% of those that responded to this question disagreed with the proposal. Most of those that commented felt that the database was not needed. They believed that it should be the responsibility of each purpose granted an exemption to record full details of its trained drivers and to be in a position to provide those details upon receipt of a reasonable request for them.
95. Overall 48% of respondents did not answer the question.

EXEMPTION FROM OTHER ROAD TRAFFIC REGULATIONS

96. **Question 13:** Do you agree with the overall approach proposed by the Department with regard to exemptions for other Road Traffic laws?
97. Of the 52 responses to this question 48 (92%) agreed with this proposal. ROSPA agreed that the overall approach in regard to exemptions for other road traffic laws should be the same as for the speed limit exemption. They added that the mandatory training course should also include training for these exemptions.
98. Other comments in support of the proposal included:
- Mine Rescue commented that the other road traffic laws were the main cause of delays for emergency responses, not being restricted to statutory

speed limits. Other road users “expect” Blue Light users to be able to negotiate vehicles/red lights etc being unable to do so can cause confusion.

- Northern Ireland Ambulance Service agreed commenting that the use of only blue lights can be misleading to other road users and potentially dangerous. That being the case, blue lights and sirens should only be used for emergency responses by vehicle purposes that can claim all the exemptions.
99. The police service agreed in principle with this proposal but expressed some reservations. The Police Federation of England and Wales suggested that maybe speed limit exemptions are not always necessary, but making progress through congested areas and red lights are. Careful consideration must be given on a case by case basis. The Federation urged that, whatever is decided, there must be adequate awareness training and testing of drivers to enable them to make safe progress through heavy traffic. Other police services held similar views.
100. 8% of those that responded to this question disagreed with the proposal. Most of those that commented felt that speed should be separated from the other exemptions but training should be required for both.
101. Overall 41% of respondents did not answer the question.
102. **Question 14:** Should all drivers who operate vehicles which are exempt from speed limits in certain circumstances also be exempt from the five regulations related to: Traffic Signals, Signalled Crossings, certain signs and the use of Hard Shoulders?
103. Of the 55 responses to this question 52 (95%) agreed with this proposal, but commented that the other exemptions must be incorporated into the driver training course. Some stakeholders also believed that this proposal would make it less confusing for the average motorist to deal with. They felt that vehicles sitting at traffic lights with blue lights illuminated can cause more of a hazard (with the surrounding traffic still trying to give way) than if the vehicle was allowed to travel through the traffic lights with caution, using an audible siren.
104. Other comments included:
- Scottish Ambulance Service believed that the proposal would avoid interpretation of what exemptions can and cannot be claimed. Therefore, where an incident requires investigation it will be on the basis of “was it justifiable to claim the exemption” and “was the standard met”.
 - Durham & Darlington FRS support the proposal so long as all operators have robust Risk assessments and Safe Systems of Work in place to ensure safety is at the forefront of all drivers decisions to use exemptions.

- ACPO held similar views commenting that this should be subject to the caveat that responders must be able to justify their actions with respect to the exemptions used.
105. 5% of those that responded to this question disagreed with the proposal. Those that commented raised concern that the exemption should not be available to be used for convenience and merely to avoid traffic delays in respect of non emergencies.
106. Overall 38% of respondents did not answer the question.
107. **Question 15:** Should the purposes exempted from the five regulations related to Traffic Signals, Signalled Crossings, certain signs and the use of Hard Shoulders be otherwise retained broadly as they are?
108. Of the 48 responses to this question 43 (90%) agreed with this proposal. The main reason given was that there seemed to be little benefit in making any changes.
109. Other stakeholders broadly agreed with this but believed there was merit in considering additional life saving or security purposes if they could demonstrate a need for the exemptions. NHS Blood and Transplant suggested that Blood and Human Tissue should be specified as they currently only have exemptions to certain regulations.
110. Similarly, ACPO raised the issue of volunteers responding on behalf of Police Forces in mountain, open area or cave rescues and searches for vulnerable high risk missing persons; and assisting in searching rivers or flooded areas. In these instances they supported the use of an exemption from passing keep left and keep right arrows only when responding to specific request from an emergency service and where the driver has received suitable training.
111. 10% of those that responded to this question disagreed with the proposal. Those that commented felt that these regulations should be amended in line with section 19 and the exemption should only be valid if training has been completed in line with the requirements of this legislation.
112. Overall 45% of respondents did not answer the question.
113. **Question 16:** Should the purposes for which blue lights & sirens are fitted be retained broadly as they are?
114. Of the 51 responses to this question 47 (92%) agreed with this proposal. The main reason given was that there is little benefit in making any change. MOD added that it should be reinforced that not all blue light use would necessarily be at high speed.
115. Greater Manchester FRS raised concern that an increase in blue lights might mean that the perceived importance to the public might decrease, and they may, over time, become more complacent about emergency response vehicles.

116. Other stakeholders broadly agreed with this proposal but felt that blue light and sirens should be available to a range of users, under broader headings than there are currently. This change would allow for more flexibility for operators, whilst not increasing the risk of misuse. For instance, more specialist services such as underground and confined space rescue exist, but the regulation stipulates only mine rescue by a given operator.
117. 8% of those that responded to this question disagreed with the proposal. The following comments were made:
- There are a growing number of uncontrolled organisations/individuals using blue lights for purposes that, upon further scrutiny, are at best dubious. An example being blood products delivered to hospitals on a voluntary basis. There are concerns about the legitimacy of such situations and the insurance implications. The review of this legislation provides an opportunity to tighten up any loopholes and encourage greater enforcement against illegal use.
 - Blue lights and sirens are governed by separate regulation i.e. Lighting Regulations - which allow for human tissue transportation and Construction and Use for the audible warning which do not. The two should be unified into any new legislation.
118. Overall 42% of respondents did not answer the question.
119. **Question 17:** Should further exemptions from any more signing regulations be added?
120. Only 44% of respondents (21 out of 48) agreed that there should be further exemption from signing regulations. Most stakeholders nominated solid white central lines and no left and right turn signs. This was followed by the use of bus lanes. The main comments were:
- Most of the stakeholders who supported the inclusion of solid white lines agreed with the views of the Police Superintendents of England and Wales. They commented that there are a number of regulations such as solid white lines that, as long as a trained driver risk assesses the situation, should be included. They point out that this exemption would not immediately pose any more of a risk than contravening a red light, or exceeding the speed limit.
 - Those who supported no left and right turn felt that these signs can hinder the use emergency response vehicles at the end of one way streets. Some stakeholders also pointed out that no left and right turn signs are subject to local controls and local provision. This can cause confusion and difficulty for emergency response drivers operating in different areas.
 - NHS Blood and transplant (NHSBT) support the use of bus lanes. They commented that they have experienced significant challenges in densely

populated and heavy traffic areas where standing traffic blocks roads – but where a bus lane is available to be used. They point out that the three emergency services are permitted to use bus lanes but NHSBT cannot. IAM agree that there should be a consistent general exemption, applying to any user of blue lights

121. 56% of those that responded to this question disagreed, believing that more exemptions could cause confusion and lead to more accidents. Some stakeholders suggested that further exemptions should not be considered without consultation on each proposed exemption.
122. Overall 45% of respondents did not answer the question.
123. **Question 18:** Should a non-statutory competence standard for blue light training be developed and if so, by whom?
124. **Question 19:** Should the regulation of blue light training be considered further?
125. Most stakeholders chose to respond to Q18 and 19 together. Of the 52 responses to these questions 30 (58%) agreed that blue light training should be considered further – although there was some disagreement about whether this should be a non-statutory course or not. Overall stakeholders recognised that there was a need for high standards and competences amongst blue light users. This was particularly so as the use lights and sirens can often cause others to react in an unpredictable manner thereby presenting risks to other road users.
126. Where stakeholders agreed that a course should be developed most felt that this should be done by representatives from the emergency services with input from the voluntary sector.
127. 42% of those that responded to this question disagreed. Most of those that commented argued that a statutory course should be developed. The main comments were:
 - A non-statutory approach will allow some users to adopt a watered down approach with the attendant risks. This is an opportunity to lead by example in requiring high-profile road users to be trained to a high standard.
 - Non-statutory competence standards would be difficult to monitor or enforce. Consideration should be given to a statutory provision similar to the High Speed Driver Training proposal.
 - Other stakeholders believed that a non-statutory blue light course already existed so further consideration was unnecessary. Mine Rescue commented that they have accessed high standard “Blue Light” driver training provided by the “same” provider as some Police Forces. But others

suggested that currently no need has been demonstrated for a national blue light training course, in instances where speed exemption is not to be used.

OTHER COMMENTS

128. **Question 20:** Do you agree with the Department's proposal to create an additional exemption to seat belt wearing law relating to the emergency treatment of patients in Ambulances?

129. Everyone that responded to this question (54) agreed with this proposal in principle so long as personal safety is maintained as much as possible. MOD added that the ability for ambulance crews to save life and render first aid should be the overarching requirement. Other comments include:

- South Yorkshire Safer Roads Partnership agreed with this proposal but commented that it is unclear whether 'paramedics not in ambulances' are included. They believed that they should be included and have to undergo the regular training/assessment.
- Northern Ireland Ambulance Service commented that the exemption should be applicable to all operational ambulance staff not only accident and emergency staff.

130. **Question 21:** Do you think that the proposed changes would have any other implications, which have not been considered in this consultation document or Impact Assessment; if so, please can you identify/quantify what these would be?

131. The following issues were raised:

- **Transport of retrieval teams** - National Organ Retrieval Service (NORS) teams attending a donor hospital in order to retrieve organs should be included. NORS teams are carried in a variety of vehicles, including people carriers, equipped with Blue Lights and Sirens and driven by qualified drivers. If these teams are delayed the opportunity to use the retrieved organ may be lost as it has exceeded its viable usage time. Similarly, blood and samples being transported to laboratories - any organ destined for transplant is required to have several tissue typing tests completed in order to see if it is suitable for the intended recipient.
- **Pollution** - Increased speeds increase pollution how would this be mitigated to prevent the government missing its EU targets?
- **Pedestrians and Cyclists** - The training documents and impact assessment barely mentions the protection of cyclists and pedestrians. If greater attention is not given to the needs of pedestrians and cyclists during this change, then rather than saving lives, more could end up being needlessly lost.
- **Driving Tests & Publicity Costs** – Extension of speed limit exemptions will require more training (as part of driving tests) and a publicity campaign about how to respond to approaching emergency vehicles.

- **Other Road Traffic Law** - Exemption from other road traffic law - Hard shoulders are specific parts of motorway regulations, and create their own unique problems, risks and safety considerations. We suggest checking motorway regulations are not also in need of amendment or change if this is to be approved.
- **Impact on Road Safety** - The evidence base has not been set out to support the assumption that this proposal will carry a benefit to the public. There is no analysis of the impact that this proposal may have on KSIs or the costs to families, communities and the economy. The consultation does not consider the impact on people with impaired hearing, children and those with learning disabilities that might not understand sirens or the elderly and disabled that might not be able to get out of the way quickly in the event of more speeding vehicles.
- **Financial Burdens** – There is a very real danger that the proposals may place commercial training organisations at a distinct disadvantage when working to deliver training if they have to comply with stricter regulation regarding the registration and regulation of its trainers and courses.
- **Speed Cameras & Other costs** – Who will be held to account to justify the use of the exemption when travelling through fixed **speed camera** sites? When the fatality occurs involving a non Emergency purpose will there be a vicarious liability to an existing body? Will an RNLI person be acting on behalf of the Coastguard? Newly exempt organisations would presumably need to increase their **insurance liability**. There will be **additional costs** related to the increased 'fear of crime'; a potential public perception where additional lights and sirens are seen or heard.
- **Training accreditation** – The decision to exempt the existing emergency services could lead to legal challenge. It would lead to a clear breach of UK and EU competition law, by creating an inequity between statutory bodies and the private providers who offer identical services. The effect would be to unfairly burden private providers with an additional cost, whilst the statutory services with whom they directly compete for business would not incur this cost.
- **Speed Limit compliance** - If more organisations/ vehicles are legitimately allowed to exceed speed limits this could encourage further non-compliance among other road users. Extending the exemptions could lead to erosion of the special nature of “emergency blue light” responses. How will the use of exemptions be enforced? What will happen if there has been inappropriate use of the exemptions? Will this be self-enforcing or externally enforced? What checks are in place?
- **Do nothing option** - The impact of doing nothing would require a re-definition of the terms of “police, fire or ambulance purpose” to allow for HMRC conducting surveillance on drug importers, or the Security Service doing so for terrorist suspects, as examples. This redefinition would be likely to be very difficult, and itself require some form of legislative change.

Annex A

CONSULTATION QUESTIONS

Question 1: Do you agree that in principle Section 19 of the Road Safety Act (2006) should be implemented? If so, when should it be implemented?

Question 2: Do you agree with the criteria the Department proposes to use to consider whether to add additional purposes for speed limit exemptions?

Question 3: Should the additional purposes for speed limit exemptions be largely confined to some of the organisations and purposes currently allowed to fit and use blue lights?

Question 4: Do you wish to nominate a specific purpose as one that should be granted an exemption from speed limits? If so is there any evidence related to any specific purposes you would like us to be aware of?

Question 5: Are there any vehicle purposes (including those listed) which you consider are unsuitable for a speed limit exemption?

Question 6: Should the Code of Practice produced by the Speed Limit Exemption Driver Training Steering Group in 2008 be the basis of a statutory Code of Practice?

Question 7: Do you have any comments on the details of the Code of Practice?

Question 8: Should the frequency of training and transitional arrangements be included specifically in the regulations or not?

Question 9: Do you agree with the proposal to require accreditation by the Secretary of State for some of the Speed Limit Exemption Driver Training, with the exceptions set out in the consultation document?

Question 10: Do you agree with not setting maximum fees for courses?

Question 11: Do you agree with the proposal about the Driving Standards Agency's (DSA) fees?

Question 12: Should there be a regulated statutory database listing trained drivers, other than those in police, fire and rescue authorities, NHS ambulance service, SOCA and the military/security services?

Question 13: Do you agree with the overall approach proposed by the Department with regard to exemptions for other Road Traffic laws?

Question 14: Should all drivers who operate vehicles which are exempt from speed limits in certain circumstances also be exempt from the five regulations related to: Traffic Signals, Signalled Crossings, certain signs and the use of Hard Shoulders?

Question 15: Should the purposes exempted from the five regulations related to Traffic Signals, Signalled Crossings, certain signs and the use of Hard Shoulders be otherwise retained broadly as they are?

Question 16: Should the purposes for which blue lights & sirens are fitted be retained broadly as they are?

Question 17: Should further exemptions from any more signing

regulations be added?

Question 18: Should a non-statutory competence standard for blue light training be developed and if so, by whom?

Question 19: Should the regulation of blue light training be considered further?

Question 20: Do you agree with the Department's proposal to create an additional exemption to seat belt wearing law relating to the emergency treatment of patients in Ambulances?

Question 21: Do you think that the proposed changes would have any other implications, which have not been considered in this consultation document or Impact Assessment; if so, please can you identify/quantify what these would be?

Annex B

Summary Analysis of responses to consultation

	Ambulance Service		Fire & Rescue Service		Police Service		Interested Groups/ Organisations		Members of the Public		Total	
		%		%		%		%		%		%
Q1												
Yes	11	73	9	100	6	100	22	81	18	58	66	75
No	2	13	0	0	0	0	1	4	2	6	5	6
No comment	2	13	0	0	0	0	4	15	11	35	17	19
	15		9		6		27		31		88	
Q2												
Yes	9	60	9	100	2	33	20	74	3	10	43	49
Mixed	0	0	0	0	3	50	0	0	1	3	4	5
No	1	7	0	0	0	0	1	4	1	3	3	3
No comment	5	33	0	0	1	17	6	22	26	84	38	43
	15		9		6		27		31		88	
Q3												
Yes	10	67	4	44	2	33	14	52	4	13	34	39
Mixed	0	0	0	0	1	17	0	0	0	0	1	1
No	0	0	5	56	2	33	5	19	1	3	13	15
No comment	5	33	0	0	1	17	8	30	26	84	40	45
	15		9		6		27		31		88	
Q4												
Yes	7	47	5	56	5	83	13	48	11	35	41	47
No	4	27	4	44	1	17	6	22	2	6	17	19
No comment	4	27	0	0	0	0	8	30	18	58	30	34
	15		9		6		27		31		88	
Q5												
Yes	1	7	3	33	5	83	4	15	9	29	22	25
No	8	53	6	67	0	0	14	52	2	6	30	34
No comment	6	40	0	0	1	17	9	33	20	65	36	41
	15		9		6		27		31		88	
Q6												
Yes	9	60	8	89	5	83	23	85	4	13	49	56
Mixed	2	13	0	0	0	0	0	0	0	0	2	2
No	0	0	1	11	0	0	0	0	0	0	1	1
No comment	4	27	0	0	1	17	4	15	27	87	36	41
	15		9		6		27		31		88	
Q7												
Yes	9	60	8	89	3	50	12	44	7	23	39	44
No	3	20	1	11	1	17	8	30	1	3	14	16
No comment	3	20	0	0	2	33	7	26	23	74	35	40
	15		9		6		27		31		88	
Q8												
Yes	10	67	8	89	5	83	20	74	3	10	46	52
Mixed	0	0	0	0	0	0	2	7	0	0	2	2
No	1	7	1	11	0	0	1	4	1	3	4	5
No comment	4	27	0	0	1	17	4	15	27	87	36	41
	15		9		6		27		31		88	

	Ambulance Service		Fire & Rescue Service		Police Service		Interested Groups/ Organisations		Members of the Public		Total	
Q9												
Yes	10	67	9	100	4	67	17	63	4	13	44	50
Mixed	0	0	0	0	1	17	0	0	0	0	1	1
No	0	0	0	0	0	0	4	15	0	0	4	5
No comment	5	33	0	0	1	17	6	22	27	87	39	44
	15		9		6		27		31		88	
		%		%		%		%		%		%
Q10												
Yes	8	53	5	56	3	50	17	63	4	13	37	42
Mixed	0	0	1	11	0	0	0	0	0	0	1	1
No	1	7	2	22	0	0	3	11	1	3	7	8
No comment	6	40	1	11	3	50	7	26	26	84	43	49
	15		9		6		27		31		88	
Q11												
Yes	8	53	4	44	2	33	14	52	3	10	31	35
Mixed	1	7	0	0	0	0	0	0	0	0	1	1
No	3	20	4	44	2	33	4	15	1	3	14	16
No comment	3	20	1	11	2	33	9	33	27	87	42	48
	15		9		6		27		31		88	
Q12												
Yes	9	60	7	78	5	83	13	48	3	10	37	42
Mixed	0	0	1	11	0	0	2	7	0	0	3	3
No	1	7	0	0	0	0	5	19	0	0	6	7
No comment	5	33	1	11	1	17	7	26	28	90	42	48
	15		9		6		27		31		88	
Q13												
Yes	10	67	7	78	6	100	21	78	4	13	48	55
No	1	7	1	11	0	0	1	4	1	3	4	5
No comment	4	27	1	11	0	0	5	19	26	84	36	41
	15		9		6		27		31		88	
Q14												
Yes	12	80	8	89	6	100	21	78	5	16	52	59
No	0	0	1	11	0	0	1	4	1	3	3	3
No comment	3	20	0	0	0	0	5	19	25	81	33	38
	15		9		6		27		31		88	
Q15												
Yes	11	73	8	89	5	83	15	56	4	13	43	49
No	0	0	1	11	0	0	4	15	0	0	5	6
No comment	4	27	0	0	1	17	8	30	27	87	40	45
	15		9		6		27		31		88	
Q16												
Yes	11	73	9	100	5	83	18	67	4	13	47	53
No	1	7	0	0	0	0	3	11	0	0	4	5
No comment	3	20	0	0	1	17	6	22	27	87	37	42
	15		9		6		27		31		88	

	Ambulance Service		Fire & Rescue Service		Police Service		Interested Groups/ Organisations		Members of the Public		Total	
		%		%		%		%		%		%
Q17												
Yes	8	53	1	11	5	83	6	22	1	3	21	24
No	4	27	7	78	0	0	12	44	4	13	27	31
No comment	3	20	1	11	1	17	9	33	26	84	40	46
	15		9		6		27		31		88	
Q18 / Q19												
Yes	5	33	6	67	5	83	10	37	4	13	30	34
No	7	47	3	33	0	0	11	41	1	3	22	25
No comment	3	20	0	0	1	17	6	22	26	84	36	41
	15		9		6		27		31		88	
Q20												
Yes	12	80	9	100	5	83	22	81	6	19	54	61
No	0	0	0	0	0	0	0	0	0	0	0	0
No comment	3	20	0	0	1	17	5	19	25	81	34	39
	15		9		6		27		31		88	

List of Replies from Public Consultation

Ambulance Service/Associations (Public & Private Sector)

Association of Ambulance Chief Executives
BASICS Scotland
British Ambulance Service
British Association for Immediate Care (BASICS)
IAS Medical Ltd
Independent Ambulance Association
National Association of Private Ambulance Service
NHSBT (Blood & Blood components transportation)
NHSBT (Organ donation & transportation)
Northern Ireland Ambulance Service
Riviera Ambulance Service
Scottish Ambulance Service
St John's Ambulance
St John Cymru - Wales
Strathclyde Ambulance Service

Fire & Rescue Service

Chief Fire Officers' Association
Durham & Darlington Fire & Rescue Service
Greater Manchester Fire & Rescue Service
Leicestershire Fire & Rescue Driver Training
London Fire Brigade
Oxfordshire & Buckinghamshire Fire & Rescue
Shropshire Fire & Rescue
Tyne & Wear Fire & Rescue Service
West Midlands Fire Service

Police/Police Associations

ACPO (Association of Chief Police Officers)
ACPOS (Association of Chief Police Officers in Scotland)
Metropolitan Police Service
Police Federation of England & Wales
Police Superintendents' Association of England & Wales
Sussex Police

Interested Groups/Organisations

Association of Industrial Road Safety Officers
BRAKE
British Cave Rescue Councils

British Red Cross
Cardinus Risk Management Limited
Civil Aviation Authority
EMSTAR (Emergency Service Training & Review)
Emergency Response Driver Training
Essential Training Organisation
Essex County Council
GARFIS (Independent Lifeboat Charity)
Hertfordshire County Council
Institute of Advanced Motorists
LHR Airports Ltd
Mine Rescue Service Ltd
Ministry of Defence
Mountain Rescue England & Wales
National Association of Blood Bikes
Newcastle City Council
North West Blood Bikes
North Yorkshire County Council
Peak District National Park
RoadSkillsPlus
ROSPA (Royal Society for the Prevention of Accidents)
SERV (Service by Emergency Rider Volunteers)
South Yorkshire Safer Roads Partnership
Transport for London

Plus 31 Members of the Public